

**BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2012-336-C**

IN RE:)
)
APPLICATION OF TAG MOBILE, LLC)
FOR DESIGNATION AS AN ELIGIBLE)
TELECOMMUNICATIONS CARRIER IN)
THE STATE OF SOUTH CAROLINA)

TESTIMONY OF FRANK DEL COL

ON BEHALF OF

TAG MOBILE, LLC

1 **Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

2 **A.** My name is Frank Del Col. My business address is 1330 Capital Parkway, Carrollton,
3 Texas 75006.

4 **Q. BY WHOM AND IN WHAT CAPACITY ARE YOU EMPLOYED?**

5 **A.** I am the President and Chief Executive Officer of TAG Mobile, LLC (“TAG Mobile”
6 or “Company”) and have been employed in that capacity since August of 2012.

7 **Q. PLEASE DESCRIBE YOUR WORK EXPERIENCE.**

8 **A.** I have over 29 years of experience in the wireless carrier industry. I have held senior
9 management positions in Verizon, Nextel, McCaw, ATT/Centennial, ATC, Trintel and
10 others. I have successfully led teams that launched regional mobile networks across
11 multiple states and technologies in the United States.

12 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

13 **A.** The purpose of my testimony is to support the Application of TAG Mobile for
14 designation as an eligible telecommunications carrier (“ETC”) throughout the proposed
15 service areas of South Carolina for the purpose of receiving federal universal service
16 “Lifeline” support from the low income fund.

17 **Q. ARE ALL OF THE STATEMENTS IN TAG MOBILE’S APPLICATION**
18 **CORRECT AND TRUE TO THE BEST OF YOUR KNOWLEDGE,**
19 **INFORMATION, AND BELIEF?**

20 **A.** Yes.

21 **Q. DO YOU WISH TO INCORPORATE BY REFERENCE ANY DOCUMENTS**
22 **INTO THIS TESTIMONY?**

23 **A.** Yes. I wish to incorporate, by reference, TAG Mobile’s underlying Application filed in

1 this proceeding and the exhibits attached filed on September 12, 2012.

2 **Q. HAS ANYTHING OCCURRED SINCE TAG MOBILE’S APPLICATION WAS**
3 **FILED THAT MATERIALLY CHANGES THE REPRESENTATIONS**
4 **THEREIN?**

5 A. No.

6 **Q. PLEASE DESCRIBE TAG MOBILE.**

7 A. TAG Mobile is a wholly owned subsidiary of Amvensys Capital Group, LLC
8 (“Amvensys”). The Company was organized as a Texas Limited Liability Company in
9 March of 2012 and has been providing commercial mobile radio services (“CMRS”)
10 and Lifeline service since October 2010. TAG Mobile will offer resold wireless
11 services obtained from its underlying wireless providers, Sprint and Verizon Wireless
12 (“VZW”). VZW airtime is purchased through Coast 2 Coast Cellular, Inc., a reseller
13 for VZW, and Sprint airtime is purchased direct from Sprint. The Company seeks ETC
14 designation to provide handsets and voice services to low-income customers. South
15 Carolina customers can currently purchase TAG Mobile’s products and services
16 through its website. However, the Company is not yet actively marketing in South
17 Carolina and does not currently have any South Carolina customers. TAG Mobile has
18 never been denied ETC designation by any state commission or by the FCC. TAG
19 Mobile has been designated as an ETC in the States of Arkansas, Colorado, Kansas,
20 Kentucky, Louisiana, Maryland, Michigan, Oklahoma, Pennsylvania, West Virginia
21 and Wisconsin and currently has applications for ETC designation pending in
22 California, Georgia, Illinois, Massachusetts, Minnesota, Mississippi, Missouri, New
23 Jersey, Ohio and Texas as well as the Federal Jurisdiction states of Alabama,

1 Connecticut, Delaware, the District of Columbia, Florida, New Hampshire, New York,
2 North Carolina, Tennessee and Virginia.

3 **Q. PLEASE DESCRIBE THE CORPORATE STRUCTURE OF TAG MOBILE.**

4 A. TAG Mobile is one of thirteen wholly owned subsidiaries of Amvensys. A current
5 corporate organizational chart is attached as **Exhibit** 1. Three of the Amvensys
6 companies offer telecommunications services and two of the three are eligible
7 telecommunications carriers. Two of these affiliated companies, Unity Telecom, LLC,
8 formerly dPi Teleconnect, and Voicecom Telecommunications, LLC, doing business as
9 Intelliverse, are certificated to provide telecommunications services in South Carolina.

10 **Q. PLEASE DESCRIBE TAG MOBILE’S SERVICE OFFERINGS.**

11 A. The South Carolina Lifeline customer can chose from the following Basic Lifeline
12 Service Plans (the “Plans”):

13	250 Minute Voice Only Plan	Retail Price
14		
15	Lifeline	Free
16		
17	250 Minute Talk/Text Plan	
18		
19	Lifeline	Free
20		
21	Non-Lifeline	\$12.75

22 TAG Mobile does not differentiate long distance toll usage for local usage so there are
23 no additional charges for toll calls. In addition to the free monthly minutes of use
24 described above, the Plans will include a free handset as well as the following customer
25 calling features: caller ID, call waiting, call forwarding, 3-way calling and voicemail.

26 TAG Mobile will also offer qualified South Carolina Lifeline customers the
27 option of applying their Lifeline discount to any of TAG Mobile’s other voice

1 telephony service offerings, to include its Wireless Landline Replacement product or
2 pre-paid minute plans that include data services.

3 Lifeline customers can also purchase additional bundles of minutes, referred to
4 in TAG Mobile's general terms and conditions as Replenishment plans. TAG Mobile's
5 Replenishment plans may be purchased as standalone pre-paid service plans except the
6 "30 Day Plan 1" for \$7.00. TAG Mobile's Service Plan offerings¹ are as follows:

7 Basic Service Plan – 250 minutes, text not included (decrements at 1/1) for \$12.75
8 30 Day Plan 1 – 100 minutes, up to 200 text messages & 5MB data² for \$7.00
9 30 Day Plan 2 – 500 minutes, up to 1000 text messages & 20MB data for \$20.00
10 30 Day Plan 3 – 1000 minutes, up to 1200 text messages & 30MB data for \$30.00
11 Unlimited Talk & Text – 30 day term – for \$39.00
12

13 When applying the Lifeline discount to these expanded service offerings, the purchase
14 of additional equipment may be required such as the Wireless Terminal Device or a
15 data capable handset. The Lifeline discount cannot be applied to the purchase of
16 equipment of any kind. If the customer already owns equipment that is compatible
17 with TAG Mobile's network and if such equipment meets TAG Mobile's minimum
18 specifications regarding 911/E911 compliance, the customer can use their own
19 equipment.

20 **Q. PLEASE OUTLINE THE MONTHLY CHARGES FOR A TYPICAL LIFELINE**
21 **CUSTOMER.**

22 A. The customer has several options. If the Lifeline customer chooses the 250 Minute
23 Voice Only Plan, 250 Minute Talk/Text Plan, or the Basic Service Plan, there are no
24 monthly charges or access fees for these plans. If the customer chooses to apply the

¹ All TAG Service Plan offerings are available for use with the Wireless Terminal Device as part of the Wireless Land Line Replacement product, however the text and data capabilities are not available with this product.

² Available only on phones with data capabilities.

1 Lifeline Credit to one of TAG Mobile's other service offerings as described above, then
2 the recurring charges are reduced by \$12.75 monthly as the Lifeline credit is applied.

3 **Q. CAN CUSTOMERS PURCHASE ADDITIONAL AIRTIME?**

4 A. Yes, TAG Mobile customers can purchase additional minutes at retail locations such as
5 Ace Cash Express, CVS, Dollar General, Murphy Oil, and Walgreen's. Additional
6 minutes can also be purchased direct with TAG Mobile either through the Company's
7 website at www.tagmobile.com, or through TAG Mobile's customer service
8 department.

9 **Q. DOES TAG MOBILE SATISFY THE REQUIREMENTS FOR DESIGNATION**
10 **AS A LIFELINE-ONLY ETC?**

11 A. Yes, TAG Mobile will offer all required services and functionalities required by the
12 federal and state authorities.

13 **Q. HAS TAG MOBILE SOUGHT FORBEARANCE FROM THE FEDERAL**
14 **COMMUNICATIONS COMMISSION FROM APPLYING THE FACILITIES**
15 **REQUIREMENT OF SECTION 214(e)(1)(A) ?**

16 A. Yes, TAG Mobile opted to pursue Blanket Forbearance. On August 8, 2012, TAG
17 Mobile received FCC approval of its Compliance Plan. The approved Plan was
18 attached to the application and is incorporated by reference.

19 **Q. IS TAG MOBILE A COMMON CARRIER AS DEFINED BY 47 U.S.C. §**
20 **153(10)?**

21 A. Yes, TAG Mobile is regulated as a common carrier in connection with its provision of
22 Commercial Mobile Radio Service ("CMRS"). TAG Mobile certifies that it is a
23 common carrier for purposes of ETC designation.

1 **Q. PLEASE DESCRIBE HOW TAG MOBILE WILL PROVIDE ALL REQUIRED**
2 **SERVICES AND FUNCTIONALITIES.**

3 A. TAG Mobile will be able to offer all of the services and functionalities required by 47
4 CFR § 54.101(a) and 54.202 and 26 S.C. Code Regs. 103-690(C)(a) through its service
5 arrangements with underlying carriers Sprint and VZW.

6 **Q. PLEASE DESCRIBE THE SUPPORTED SERVICES OFFERED BY THE**
7 **COMPANY.**

8 A. TAG Mobile will (1) offer voice telephony services, (2) minutes of use for local service
9 at no additional charge as described earlier, (3) access to emergency services provided
10 by the local government or other public safety officials, including 911 and E911 where
11 available. The Company will provide each eligible wireless customer who chooses one
12 of the Plans with a 911 compliant handset at no cost. (4) TAG Mobile does not provide
13 toll limitation service (“TLS”) since it does not differentiate domestic long distance toll
14 usage from local usage and all usage is paid for in advance.³ The Company will not
15 seek reimbursement for TLS. TAG Mobile will provide access to operator services and
16 directory assistance either through its own facilities or through arrangements with
17 Sprint and VZW.

18 **Q. PLEASE DESCRIBE HOW TAG MOBILE PROVIDES THE SUPPORTED**
19 **SERVICES.**

20 **Voice-Grade Access to the Public Switched Telephone Network & Local Usage**

³ *In the Matter of Lifeline and Link Up Reform and Modernization, Lifeline and Link Up, Federal-State Joint Board on Universal Service, Advancing Broadband Availability Through Digital Literacy Training, WC Docket No. 11-42, WC Docket No. 03-109, CC Docket No. 96-45, WC Docket No. 12-23, Report and Order and Further Notice of Proposed Rulemaking, FCC 12-11 (rel. Feb. 6, 2012) (“Lifeline Reform Order”), ¶ 229-238.*

1 A. TAG Mobile will offer voice telephony service plans including voice grade access to
2 the public switched network. TAG Mobile’s wireless service in South Carolina will
3 include local usage that allows customers to originate and terminate calls within a local
4 calling area without additional charge.

5 **Access to Emergency Service**

6 TAG Mobile customers will be able to reach an emergency calling service or the public
7 safety answering point (“PSAP”) by dialing “911.” They will also be able to access
8 enhanced 911 (“E911”) where available. The emergency call will be routed to the
9 appropriate PSAP. TAG Mobile delivers both automatic numbering information
10 (“ANI”) and automatic location information (“ALI”) to PSAPs that are capable of both
11 receiving and using the data and that have made arrangements for the delivery of the
12 data. Emergency access will be available from TAG Mobile handsets regardless of the
13 activation status and/or availability of minutes. In the event that an existing TAG
14 Mobile customer does not have an E911-compliant handset, the Company will replace
15 the handset with a new 911/E911 compliant handset at no charge. Any new Lifeline
16 customer will receive a 911/E911 compliant handset. TAG Mobile will remit 911
17 payments for its wireless operations to the designated 911 county authorities in South
18 Carolina.

19 **Toll Limitation for Qualifying Low Income Customers**

20 In the *Lifeline Reform* Order, the FCC concluded that the original policy rationale for
21 requiring all ETCs to offer TLS to low-income customers no longer remains valid in
22 light of the changes in the communications marketplace. The FCC noted that many
23 carriers no longer distinguish between toll and non-toll calls in how they are priced.

1 Low-income consumers have options for flat rate services regardless of the location.
2 With such service plans, the need to limit toll calls to protect against unexpected
3 charges is moot.⁴ As a result, the FCC relieved ETCs of the obligation to offer TLS if
4 their Lifeline offering does not distinguish in the pricing of toll and non-toll calls.⁵
5 TAG Mobile does not distinguish domestic long distance toll usage from local usage
6 and all usage is paid for in advance. Since TAG Mobile is a prepaid service provider,
7 customers cannot be disconnected for failure to pay toll charges, nor are there
8 additional charges for exceeding minutes.

9 **Q. ARE THERE ADDITIONAL REQUIREMENTS THAT AN APPLICANT MUST**
10 **SATISFY TO BE DESIGNATED AS AN ETC?**

11 A. Yes, the FCC recently amended the requirements in the *Lifeline Reform Order*. TAG
12 Mobile will comply with 47 C.F.R. § 54.202 that became effective April 2nd and will
13 comply with the South Carolina requirements in 26 S.C. Code Regs. § 103-690.

14 **Q. PLEASE DESCRIBE HOW TAG MOBILE WILL SATISFY THESE**
15 **ADDITIONAL REQUIREMENTS.**

16 **Commitment to Provide Service (26 S.C. Code Regs. 103-690(C)(a)(1)(A))**

17 A. TAG Mobile will be able to offer all of the services designated for support by the FCC
18 throughout the areas in which it is requesting a Lifeline ETC designation to all
19 customers making a reasonable request for service. If the Company's network already
20 passes or covers the potential customer's premises, TAG Mobile will provide service
21 immediately. For those instances where a request comes from a potential customer
22 within Applicant's proposed ETC Designated Area but outside its existing network

⁴ *Lifeline Reform Order*, ¶ 229.

⁵ *Lifeline Reform Order*, ¶ 238.

1 coverage, Applicant will provide service within a reasonable period of time if service
2 can be provided at a reasonable cost utilizing one or more of the following methods: (1)
3 modifying or replacing the requesting customer's equipment; (2) deploying a roof-
4 mounted antenna or other equipment; (3) adjusting network or customer facilities; or
5 (4) accessing or reselling services from another carrier's facilities to provide service.

6 **Advertising and Outreach Programs (26 S.C. Code Regs. 103-690(C)(a)(1)(C)**

7 TAG Mobile will advertise the availability of its Lifeline services using media of
8 general distribution in a manner reasonably designed to reach those likely to qualify.
9 Most of TAG Mobile's enrollment is done using in-person marketing by the
10 Company's field representatives. TAG Mobile also plans to offer its services through
11 retail stores such as Ace Cash Express, CVS, Dollar General, Walgreen's and Murphy
12 Oil, as well as through the Internet via TAG Mobile's online enrollment portal. Copies
13 of sample marketing materials are provided in attached **Exhibit 2**.

14 **Ability to Remain Functional in Emergency Situation (26 S.C. Code Regs. 103-**
15 **690(C)(a)(2) and 47 C.F.R. § 54.202(a)(2))**

16 TAG Mobile will remain functional in emergencies. Back-up systems are in place to
17 ensure full functionality in the event of a loss of power or network functionality
18 pursuant to the Company's Disaster Recovery Plan Procedures. In addition, TAG
19 Mobile's underlying carriers, Sprint and VZW, have created back-up systems to ensure
20 full functionality. TAG Mobile must mirror and rely on the policies and practices of its
21 underlying carriers.
22

23 **Consumer Protection and Commitment to Provide Quality Service (26 S.C. Code**
24 **Regs. 103-690(C)(a)(3) and 47 C.F.R. 54.202(a)(1) & (2))**
25

1 TAG Mobile commits to satisfying all applicable state and federal requirements related
2 to consumer protection and service quality standards. TAG Mobile commits that it will
3 comply with the Consumer Code for Wireless Service adopted by the Cellular
4 Telecommunications and Internet Association (“CTIA”). The Company also certifies
5 that it will comply with the service requirements of 47 C.F.R. § 202(a)(1)(i) and any
6 state requirements. TAG Mobile will satisfy all consumer privacy protection standards
7 as provided in 47 C.F.R. § 64, Subpart U as applicable and will protect Customer
8 Proprietary Network Information (“CPNI”) as required by state and federal law. TAG
9 Mobile will annually certify its compliance with these requirements and will also
10 report the number of consumer complaints or trouble reports per 1,000 handsets or
11 access lines.

12 **Comparable Local Usage / Rate Plan (26 S.C. Code Regs. 103-690(C)(a)(4))**
13

14 TAG Mobile is aware of the Commission’s requirement that we offer a local usage plan
15 comparable to the one offered by the incumbent carriers in the proposed service area.
16 We believe that our proposed local usage plans are comparable.

17 **Equal Access (26 S.C. Code Regs. 103-690(C)(a)(5) and 47 C.F.R. § 54.202(a)(5))**

18 TAG Mobile will provide equal access to long distance carriers, to the extent to which
19 it is able and required to do so⁶. TAG Mobile acknowledges, as required by South
20 Carolina, that it may be required to provide equal access to long distance carriers in the
21 event no other eligible telecommunications carrier is providing equal access within the
22 designated service area.

23 **Universal Service Support (26 S.C. Code Regs. 103-690(C)(a)(6))**
24

⁶ The FCC’s rules no longer require an applicant to acknowledge that the FCC may require it to provide equal access to long distance carriers. See *Lifeline and Linkup Reform Order*, p. 208, revised § 54.202(a).

1 As described earlier, TAG Mobile will offer the services supported by the federal
2 universal service support mechanisms through resale and has Blanket Forbearance from
3 the FCC.

4 **Advertising in Media of General Distribution (26 S.C. Code Regs. 103-690(C)(a7)**

5
6 TAG Mobile will advertise the availability of and the charges for its Lifeline offerings
7 using media of general distribution. In addition to direct contact at local community
8 events, TAG Mobile will advertise using print media, the Internet, retail stores and /or
9 agent locations. All Lifeline marketing materials will include the following
10 information: (1) it is a Lifeline service, (2) Lifeline is a government assistance program,
11 (3) the service is non-transferable, (4) only eligible consumers may enroll in the
12 program, (5) the program is limited to one discount per household; (6) documentation
13 necessary for enrollment; (7) TAG Mobile's name (the ETC); and (8) notice that
14 consumers who willfully make a false statement in order to obtain the Lifeline benefit
15 can be punished by fine or imprisonment or can be barred from the program. These
16 statements will be included in all print, audio video and web materials (including social
17 networking media) used to describe or enroll customers in the Company's Lifeline
18 service offering, as well as the Company's application forms and certification forms.

19 **Q. DOES TAG MOBILE HAVE THE FINANCIAL AND TECHNICAL**
20 **CAPABILITY TO PROVIDE LIFELINE SERVICE AS REQUIRED BY 47 CFR**
21 **§ 54.201(h)?**

22 A. TAG Mobile has been providing prepaid wireless telecommunications services since
23 October of 2010. The Company receives revenues from a number of sources that are
24 completely independent from its Lifeline reimbursement. Other revenues are generated

1 from the replenishment of airtime minutes, service to non-Lifeline consumers,
2 wholesale wireless service sales, data services, and text only packages. As a result, the
3 Company would not be relying exclusively on USF disbursements to operate. TAG
4 Mobile has not been subject to enforcement actions or ETC revocation proceedings in
5 any state.

6 TAG Mobile's technical and operational foundation includes its multi-carrier
7 network contracts with Sprint and VZW. TAG Mobile will rely on an integrated
8 operating system to handle provisioning, billing, inventory management and reporting.
9 The Company also has in place a complete infrastructure for device procurement and
10 certification, customer service and marketing.

11 **Q. PLEASE DESCRIBE HOW A POTENTIAL CUSTOMER'S ELIGIBILITY IS**
12 **DETERMINED.**

13 A. Customers will be required to demonstrate eligibility based on household income at or
14 below 135% of the Federal Poverty Guidelines for the household size; the household's
15 participation in the federal assistance programs listed in 47 CFR § 54.409(a)(2); or
16 meeting eligibility criteria established by South Carolina for its residents. TAG Mobile
17 will confirm that the subscriber is not already receiving a Lifeline service and no one
18 else in the household is subscribed to a Lifeline service. Customers may be enrolled in
19 person, at retail store locations or kiosks or online via TAG Mobile's web enrollment
20 portal. During the enrollment process, TAG Mobile will check each applicant against a
21 pooled duplicates database established by CGM, LLC. When the National Lifeline
22 Accountability Database becomes available, each applicant will also be checked using
23 that database. Company personnel will also emphasize the "one Lifeline phone per

1 household” restriction in their contacts with potential customers. Company personnel
2 will be trained on what is acceptable documentation of program eligibility. TAG
3 Mobile’s template enrollment and certification forms are attached as **Exhibit 3**.

4 All Company personnel interacting with potential Lifeline customers are required to
5 undergo training regarding the eligibility and certification requirements. Agents must
6 sign and return to TAG the Acknowledgement of Receipt of the training manual and
7 Code of Conduct. All agents must provide proof of employment for all employees that
8 will be enrolling Lifeline customers. All agents must read, understand and follow TAG
9 Mobile’s Code of Conduct. A copy of TAG Mobile’s Training Manual which includes
10 the Code of Conduct is attached as **Exhibit 4**. Each agent must have a signed copy of
11 the Code of Conduct on file with TAG Mobile in order to be assigned a personal login
12 to the Company’s Agent Portal prior to enrolling customers.

13 **Q. WHAT IF A POTENTIAL CUSTOMER HAS A TEMPORARY ADDRESS?**

14 A. If the customer provides a temporary address, then the customer must validate the
15 address with TAG Mobile every 90 days that the customer continues to rely on the
16 temporary address. If the customer does not validate the temporary address it will result
17 in the customer being de-enrolled from the Lifeline service.

18 **Q. PLEASE DESCRIBE ANY PROCEDURES USED TO PROTECT AGAINST**
19 **WASTE AND FRAUD?**

20 A. TAG Mobile’s Legal, Regulatory and Compliance functions are performed at the parent
21 company level. Amvensys is currently in the process of recruiting and hiring an in-
22 house Director of Compliance who will audit and provide oversight on all the
23 Company’s Lifeline operations. All Lifeline applications are reviewed by TAG

1 Mobile's Lifeline Eligibility Auditors prior to approval. TAG Mobile has implemented
2 the requirements of the Lifeline Reform Order to ensure that it provides only one
3 benefit per household through use of its application/certification forms previously
4 described, database checks and its marketing materials. Upon receiving an application,
5 TAG Mobile searches its internal records. If the applicant lives at an address with
6 multiple households, TAG Mobile will require the applicant to submit a written USAC
7 document containing (1) an explanation of the one-per-household rule, (2) a check box
8 to mark to indicate the applicant lives at an address occupied by multiple households,
9 (3) a space for certification that the applicant shares an address with other adults who
10 do not contribute income to the applicant's household and share in the expenses or
11 benefit from the applicant's income, and (4) the penalty for failure to make such
12 certification. TAG Mobile will continue to participate in the In-Depth Validation
13 process with the Federal Communications Commission and USAC to locate and
14 address duplicates between ETCs in various states until the national database is in
15 place.

16 **Q. PLEASE DESCRIBE HOW TAG MOBILE'S CURRENT PROCESS WILL**
17 **RELATE TO THE PROPOSED NATIONAL DATABASE.**

18 A. TAG Mobile requires each applicant to provide information needed to determine if the
19 residential address or individual is already receiving a Lifeline subsidy. Such
20 information is currently provided to CGM as described above. Once the proposed
21 National Database is established, TAG Mobile will provide this same information and
22 any other information required.

1 **Q. WHAT PROCEDURES DOES TAG MOBILE HAVE IN PLACE TO VERIFY**
2 **ONGOING CONSUMER ELIGIBILITY?**

3 A. As required by the *Lifeline Reform Order*, every Lifeline customer must annually verify
4 that he or she receives Lifeline-supported service only from TAG Mobile and no one
5 else in the household is receiving a Lifeline-supported service. TAG Mobile will notify
6 each Lifeline customer in writing that he or she must confirm his or her continued
7 eligibility in accordance with the applicable requirements. The notice will explain what
8 actions the customer must take to keep Lifeline benefits, when Lifeline benefits may be
9 terminated, and how to contact TAG Mobile. Results of the annual re-certification will
10 be provided to the Commission as required. The re-certification will be done on a
11 rolling basis throughout the year. Copies of TAG Mobile's current Lifeline Annual
12 Certification and Verification Form, postcard sent to customers, Lifeline recertification
13 letter, and text message are attached as **Exhibit 5**.

14 **Q. WHAT IF TAG MOBILE DETERMINES THAT A CUSTOMER IS NO**
15 **LONGER ELIGIBLE FOR LIFELINE BENEFITS?**

16 A. If TAG Mobile has a reasonable basis to believe that one of its Lifeline subscribers is
17 no longer eligible, TAG Mobile will notify the customer of impending termination in
18 writing. Lifeline service will be terminated to any customer who does not demonstrate
19 continued eligibility within 30 days following the date of the termination letter. TAG
20 Mobile will notify customers of impending termination in writing (1) if the customer
21 fails to demonstrate their continued eligibility during annual re-certification, (2) if the
22 Company believes that the customer no longer qualifies under the eligibility criteria, or
23 (3) if the customer has not used the service for 60 consecutive days.

1 **Q. DESCRIBE ANY ADDITIONAL MEASURES TAG MOBILE WILL USE TO**
2 **PREVENT WASTE, FRAUD AND ABUSE.**

3 **Usage Requirement**

4 **A.** TAG Mobile will provide a de-enrollment notice to Lifeline customers that have not
5 used the service for 60 days. TAG Mobile will notify its subscribers when service is
6 initiated about the non-transferability of the service, its usage requirements, and the de-
7 enrollment and deactivation that will result if the service is not used in any 60-day
8 period of time. Specifically, after 30 days of non-use notice is provided to the
9 subscriber that the Lifeline service must be used or other confirmation provided to
10 TAG Mobile within 30 days or the customer will be de-enrolled. Subscribers can “use”
11 the service by making a monthly payment, purchasing minutes to add to an existing
12 pre-paid Lifeline account, completing an outbound call, answering an incoming call
13 from anyone other than TAG Mobile or its representatives, or affirmatively responding
14 to a direct contact from TAG Mobile confirming that he or she wants to continue
15 receiving the Lifeline service. In addition, TAG Mobile’s usage team identifies
16 accounts that have not been used for 30 days and sends a text message asking
17 customers to respond to the text or call customer service within 30 days. After 45 days
18 of non-usage, the internal outreach team attempts to contact the customer.

19 **Customer Education with Respect to Duplicates**

20 In addition to its verification and certification procedures and to better ensure that
21 customers understand the Lifeline service restrictions regarding duplicates, TAG
22 Mobile will implement measures and procedures to prevent duplicate Lifeline benefits
23 being awarded to the same household, including use and development of an appropriate

1 database. Additional emphasis of the one-per-household restriction will be given in
2 direct sales contacts as well as in the printed and other marketing materials. The
3 Company will emphasize in plain, easily comprehensible language that (1) Lifeline is a
4 federal benefit; (2) Lifeline service is available for only one benefit or subscription per
5 household; (3) a household is defined, for purposes of the Lifeline program, as any
6 individual or group of individuals who live together at the same address and share
7 income and expense; and (4) a household is not permitted to receive Lifeline benefits
8 from multiple providers.

9 **Internal Audit and Compliance Training for TAG Mobile Lifeline Eligibility**

10 **Auditors**

11 TAG Mobile's Lifeline Eligibility Auditors will be trained in how to determine Lifeline
12 eligibility. Auditors will be checking to ensure that all fields on the certification and
13 enrollment form are complete, to verify that all eligibility documents are included
14 and/or appropriately documented, and whether they coincide with the information
15 provided on the forms. They will also check to be sure that all attestations are checked
16 and that the form is signed. For in-person and event outreach, a Quality Assurance
17 Analyst will randomly check for errors or omissions or any sign of fraud.

18 **Q. PLEASE IDENTIFY THE AREA IN WHICH TAG MOBILE SEEKS ETC**
19 **DESIGNATION.**

20 A. TAG Mobile seeks ETC designation throughout the proposed South Carolina service
21 areas. **Exhibit 4** of the Application contains a map and list of each exchange for which
22 TAG Mobile is requesting ETC status in the State of South Carolina.

1 **Q. HOW DOES THE DESIGNATION OF TAG MOBILE AS AN ETC SERVE THE**
2 **PUBLIC INTEREST?**

3 A. The availability of a wireless competitor benefits all consumers. Introducing TAG
4 Mobile into the market as an additional wireless ETC provider will afford low income
5 South Carolina residents a wider choice of providers and available services while
6 enhancing the competitive marketplace as ETCs compete for a finite number of
7 Lifeline-eligible customers. TAG Mobile submits that the public interest benefits of
8 designating TAG Mobile as an ETC include: (1) a larger local calling area and
9 expanded coverage area via multiple underlying carriers (as compared to traditional
10 wireline carriers and single wireless carriers); (2) the convenience, portability, and
11 security afforded by mobile telephone service; (3) the opportunity for customers to
12 control cost by receiving a pre-set amount of flat-rate monthly airtime; (4) the ability to
13 purchase additional low-cost usage at multiple convenient locations in the event that
14 included usage has been exhausted; (5) depending on the plan chosen, the ability of
15 users to use the supported service to send and receive “SMS” or text messages; and (6)
16 911 and, where available, enhanced 911 service in accordance with current FCC
17 requirements.

18 The FCC has long acknowledged the benefits to consumers of being able to choose
19 from a variety of telecommunications providers and the resulting variety of
20 telecommunications services they provide.⁷ This is of particular interest in cases where
21 wireless providers like TAG Mobile seek to provide service as an alternative to the
22 ILEC. The availability of a wireless competitor benefits consumers who routinely drive
23 long distances to attend work or school or to accomplish everyday tasks such as

⁷ See e.g. Specialized Common Carrier Services, 29 FCC2d 870 (1971).

1 shopping or attending community and social events. The wireless service offered by
2 TAG Mobile will provide these consumers with a convenient and affordable alternative
3 to traditional telecommunications service that can be used while at home and away
4 from home.

5 Designation of TAG Mobile as an ETC also creates competitive pressure for other
6 wireline and wireless providers within the proposed service areas. In order to remain
7 competitive in low-income markets, therefore, all carriers will have greater incentives
8 to improve networks, increase service offerings and lower prices. This results in
9 improved consumer services and, consistent with federal law, benefits consumers by
10 allowing TAG Mobile to offer the services designated for support at rates that are “just,
11 reasonable, and affordable.”⁸

12 TAG Mobile will offer an easy to use, competitive and highly affordable wireless
13 telecommunications service, which it will make available to qualified consumers who
14 either have no other service alternatives or who choose a wireless prepaid solution in
15 lieu of more traditional services.

16 TAG Mobile’s Lifeline service is available with no credit check, no deposit
17 requirement, no minimum service periods, and no early termination fees. These
18 services will be an attractive and affordable alternative to all consumers, without regard
19 to age, residency, or credit worthiness. In this economic environment, low-income
20 individuals, now more than ever, can greatly benefit from the advantages offered by
21 TAG Mobile’s Lifeline service thus allowing those adversely impacted by the failing
22 economy or job loss to have access to a free wireless service to assist in emergency
23 situations, facilitate job search efforts, and to maintain contact with family members. It

⁸ 47 U.S.C. § 254(b)(1).

1 is also a commonly accepted fact that in today's market, qualified Lifeline customers
2 view the portability and convenience of wireless service not as a luxury, but as a
3 necessity. Mobile service allows children to reach their parents, wherever they may be,
4 allows a person seeking employment the ability to be contacted by potential employers,
5 and provides end users with the ability to contact emergency service providers,
6 regardless of location.

7 **Q. DOES TAG MOBILE SPECIFICALLY CERTIFY COMPLIANCE WITH**
8 **STATE AND FEDERAL REGULATIONS?**

9 A. Yes, as indicated in my testimony and the affidavit attached to the Application, I am an
10 officer of the Company and am authorized to make the following commitments and
11 certifications on behalf of TAG Mobile:

- 12 (1) TAG Mobile will provide Lifeline service in a timely manner throughout the
13 designated service area upon reasonable request of an eligible customer;
14
- 15 (2) TAG Mobile acknowledges that South Carolina Code and the Federal
16 Communications Commission may require TAG Mobile to provide equal access
17 to long distance carriers in the event that no other eligible telecommunications
18 carrier is providing equal access within the service area;
19
- 20 (3) TAG Mobile will offer the services that are supported by the federal universal
21 service support mechanisms by using resale of another carrier's services;
22
- 23 (4) TAG Mobile will advertise in a media of general distribution the availability of
24 such services, including its Lifeline service offerings and the applicable
25 charges; and
26
- 27 (5) TAG Mobile will provide service within a reasonable period of time, if the
28 potential customer is within its licensed service area but outside its existing
29 network coverage, if service can be provided at reasonable costs.
30

31 In addition, on behalf of TAG Mobile, I make the following commitments and certify

- 32 (6) that TAG Mobile is knowledgeable of all federal and state laws and regulations
33 associated with offering Lifeline supported services and that that TAG Mobile
34 will comply with such requirements;

- 1
2 (7) that TAG Mobile will comply with the requirements of 26 S.C. Code Regs. 103-
3 690(C)(a)(1)(A) to
4
5 a. provide service on a timely basis where the network already passes the
6 potential customer's premises; and
7 b. provide service within a reasonable period of time (if the customer is in
8 the licensed service area but outside existing network coverage and if
9 service can be provided at reasonable cost);
10
11 (8) that TAG Mobile will comply with the service requirements applicable to the
12 support it receives as required by 47 CFR Section 54.202 (1)(i);
13
14 (9) that TAG Mobile will comply with the Cellular Telecommunications and
15 Internet Association's Consumer Code for Wireless Service as required by 47
16 CFR Section 54.202 (3); and
17
18 (10) that all wireless handsets issued by TAG Mobile will be capable of accessing
19 911 services without charge regardless of activation status and availability of
20 minutes;
21

22 **Q. DOES TAG MOBILE COMMIT TO COMPLY WITH ANY NEW**
23 **REGULATION THAT THE COMMISSION MAY ADOPT THAT ARE**
24 **CONSISTENT WITH THE FCC'S LIFELINE REFORM ORDER?**

25 A. Yes, we commit to comply with all state and federal ETC regulations as required and
26 all annual reporting requirements.

27 **Q. HAVE TAG MOBILE AND THE ORS ENTERED INTO A STIPULATION IN**
28 **THIS DOCKET?**

29 A. Yes, the Stipulation is being filed.

30 **Q. HAS TAG MOBILE AGREED TO ACCEPT THE CONDITIONS IN THE**
31 **STIPULATION?**

32 A. Yes.

33 **Q. DOES TAG MOBILE SUPPORT THE STIPULATION WITH THE ORS?**

34 A. Yes.

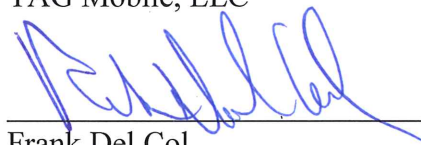
1 **Q.** **DOES THIS CONCLUDE YOUR TESTIMONY?**

2 **A.** Yes, it does.

VERIFICATION

I, Frank Del Col first being duly sworn upon oath, depose and say that I am President and Chief Executive Officer of TAG Mobile, LLC; that I have read the above Direct Testimony, and know the contents; that the contents are true, accurate, and correct to the best of my knowledge, information and belief.

TAG Mobile, LLC



Frank Del Col
President and Chief Executive Officer

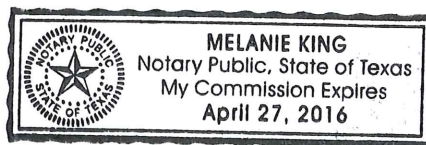
SWORN TO AND SUBSCRIBED

before me this 10th day of December, 2012.


Melanie King

Notary Public for the state of Texas

My Commission Expires: April 27, 2016



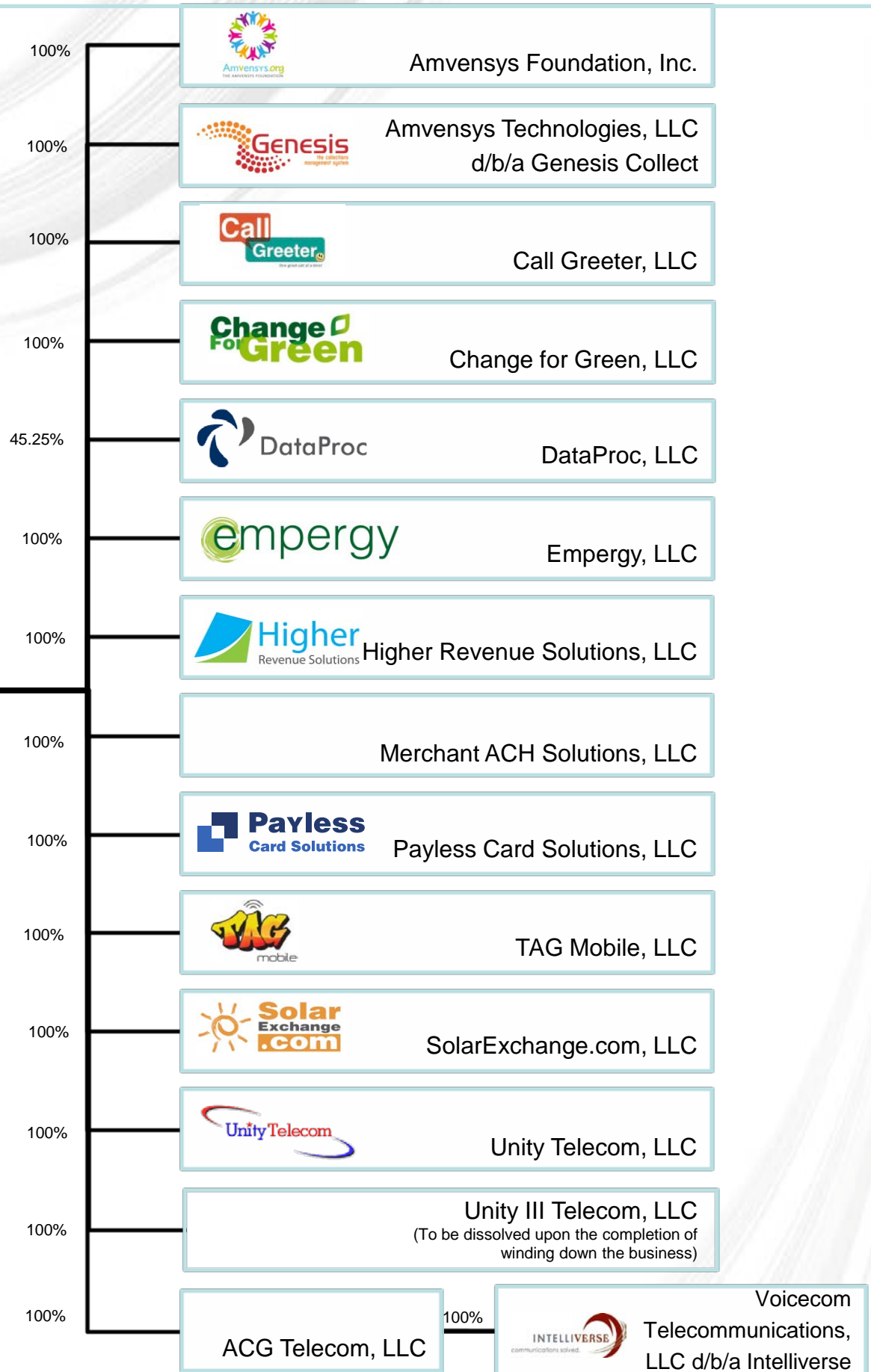
**BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2012-336-C**

IN RE:)
)
APPLICATION OF TAG MOBILE, LLC)
FOR DESIGNATION AS AN ELIGIBLE)
TELECOMMUNICATIONS CARRIER IN)
THE STATE OF SOUTH CAROLINA)

**TAG MOBILE, LLC
FRANK DEL COL
DIRECT TESTIMONY**

EXHIBIT 1

Current Corporate Organizational Chart



**BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2012-336-C**

IN RE:)
)
APPLICATION OF TAG MOBILE, LLC)
FOR DESIGNATION AS AN ELIGIBLE)
TELECOMMUNICATIONS CARRIER IN)
THE STATE OF SOUTH CAROLINA)

**TAG MOBILE, LLC
FRANK DEL COL
DIRECT TESTIMONY**

EXHIBIT 2

Sample Marketing Materials



www.tagmobile.com

FREE

Cell Phone

Free Minutes Every Month

No Contract

No Credit Check

Sign Up Today!

LIFELINE POSTER

FREE

Cell Phone

Free Minutes Every Month

No Contract

No Credit Check

Sign Up Today!

TM

TAG

mobile

This is a Lifeline service limited to one discount per household. Lifeline is a government assistance program and is non-transferrable. Proof of eligibility, such as an eligible program card or statement of benefits, is required and only eligible consumers may enroll. Consumers who willfully make a false statement in order to obtain a Lifeline benefit can be punished by fine or imprisonment or can be barred from the program.



Lifeline
Take One

If you participate in any one of the following programs, you may qualify for a FREE Cell Phone with FREE minutes every 30-days:

- *Supplemental Security Income (SSI)*
- *Food Stamps*
- *Federal Public Housing (Section 8)*
- *Medicaid*
- *Low-Income Home Energy Assistance*
- *National School Lunch Program*
- *Temporary Assistance to Needy Families (TANF)*

This is a Lifeline supported service limited to one discount per household. Lifeline is a government supported assistance program and is non-transferrable. Proof of eligibility, such as an eligible program card or statement of benefits, is required at time of sign up and only eligible consumers may enroll. Consumers who willfully make false statements in order to obtain a Lifeline benefit can be punished by fine or imprisonment or can be barred from the program.

TAG Mobile Lifeline supported service includes:

- nationwide coverage via Sprint or Verizon networks
- text messaging
- minutes good for local and domestic long distance calls
- voicemail
- 911 available even when your phone has no minutes left
- free calls to 211

IMPORTANT

You must make at least one phone call from your TAG Mobile phone a month to keep your FREE service from being shut-off.

Low Cost Reload Minute Packages

Price	Minutes Packages
\$7.00	100 Minutes / 200 texts
\$20.00	500 Minutes / 1000 texts
\$30.00	1000 Minutes / 1200 texts
\$39.00	Unlimited Talk/Text

For a reload location near you call 1-866-959-4918

By signing up for TAG Mobile's Lifeline supported service you swear and affirm that the information provided in your application is true and correct, to the best of your knowledge and belief and certify that the statements below are correct. You understand that providing false or fraudulent information to receive Lifeline benefits is punishable by law.

1. I meet the income-based eligibility criteria for Lifeline service or am a current recipient of the designated program(s) and will notify TAG within thirty (30) business days (1) if I am no longer participating in any of the designated program(s); (2) if my household is receiving more than one Lifeline supported service; or (3) if for any other reason my household no longer satisfies the criteria for receiving Lifeline support. I have provided documentation of eligibility if required.
2. The residence address provided below is my primary and permanent residence, and not a second home or business. I understand that if I move from the address included on my Application that I am required to notify TAG of my new address within 30 days.
3. If I provided a temporary residential address to TAG, I will verify my temporary residential address every 90 days.
4. I understand the notification requirements described above with respect to both program eligibility and current address information, and I further understand that I or my household may be subject to penalties if these requirements are not followed.
5. I understand that I may be required to re-certify the continued eligibility of my household for participation in the Lifeline program at any time, but will be required to provide such recertification on at least an annual basis. I understand that failure to re-certify as required will result in the termination of Lifeline benefits. I further understand that I may be subject to the same penalties for providing false or fraudulent information at the time of recertification as are applicable to the initial application.
6. I authorize TAG to access any records required to verify my statements on my application and to confirm my eligibility for the TAG Lifeline credit. I give permission to the duly authorized official(s) administering the designated program(s) to provide to TAG my participation status in such program(s). I give this permission on the condition that the information in this Application and any information about my participation in the designated programs provided by officials be maintained by TAG as confidential customer account information.
7. I authorize TAG to release any records required for the administration of the TAG Lifeline credit program (including my name, telephone number and address), including to the Universal Service Administrative Company, to be used in a Lifeline database and to ensure the proper administration of the Lifeline Program. Failure to consent will result in denial of service.
8. My household will receive only one Lifeline benefit and, to the best of my knowledge, my household is not currently receiving a Lifeline-supported service from any other provider.
9. I am entitled to complete the Application, and am not listed as a dependent on another person's tax return (unless over the age of 60)

Terms and Conditions:

Provision of a free phone and a preset amount of free monthly minutes of use are provided by TAG as part of the Universal Service Low Income support mechanism commonly referred to as the Lifeline program. Lifeline benefits are limited to a single line of service per household. You may not receive multiple Lifeline discounts. You may apply your Lifeline discount to either one landline or one wireless number, but you cannot have the discount on both. Note that not all Lifeline services are currently marketed under the name Lifeline. If you do not qualify for Lifeline supported services, you may opt to purchase a phone and pay a one-time \$60 activation fee plus the cost of the selected pre-paid package. In most cases, TAG service will only work on cellular handsets provided by/purchased from TAG. Text messaging on Lifeline accounts is decremented for mobile originating and mobile terminating messages at the rate of 3 texts, either send or received, to 1 of your free monthly minutes. It does not cost you minutes to check your voicemail from any other phone. Unused minutes expire at midnight EST on the 30th day of the billing cycle associated with your account, which is determined by your service initiation date. By activating and using this service you agree to indemnify and hold harmless TAG Mobile, LLC and its affiliates for any damages that arise from the use of the service. The wireless service described herein is provided on either the Sprint or Verizon Wireless Networks and is resold under the TAG Mobile brand. TAG Mobile is a registered trademark. For complete terms and conditions visit our website: www.tagmobile.com.

**BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2012-336-C**

IN RE:)
)
APPLICATION OF TAG MOBILE, LLC)
FOR DESIGNATION AS AN ELIGIBLE)
TELECOMMUNICATIONS CARRIER IN)
THE STATE OF SOUTH CAROLINA)

**TAG MOBILE, LLC
FRANK DEL COL
DIRECT TESTIMONY**

EXHIBIT 3

Template Enrollment and Certification Forms

(STATE) Wireless Lifeline Service Application



When completed mail or fax form to:
1330 Capital Parkway
Carrollton, TX 75006
Fax 866-254-6320
Customer Service: 1-866-959-4918



A complete and signed Lifeline Application and Certification Form ("Application") is required to enroll your household in TAG Mobile, LLC's ("TAG's") Lifeline program in your state. This Application is only for the purpose of verifying your eligibility for the Lifeline service program and will not be used for any other purpose. Lifeline is a government assistance program and only eligible consumers may enroll in the program. Lifeline service is a non-transferrable service and therefore may not be transferred to any other individual, including another eligible low-income consumer. All Lifeline subscribers must complete their own Application for service. Service requests will not be processed until this Application has been received and validated by TAG. Applicants must personally activate TAG's Lifeline service by calling 1-866-959-4918 and selecting Option 2 for activations.

Lifeline benefits are federal benefits and Applicants that make false statements in order to obtain the Lifeline benefit can be punished by fine or imprisonment, de-enrollment or can be barred from the program. Only one Lifeline service is available per household. A household is defined, for purposes of the Lifeline program, as any individual or group of individuals who live together at the same address and share income and expenses. A household may not receive multiple Lifeline benefits from multiple providers. A violation of the one-per-household requirement constitutes a violation of the Federal Communication Commission's rules and will result in de-enrollment from the program, and could result in criminal prosecution by the United States government. The Lifeline benefit may be applied to either one landline or one wireless number, but cannot be applied to both. Note that not all Lifeline services are currently marketed under the name Lifeline.

Each household will be required to verify continued eligibility for Lifeline program participation on at least an annual basis.

I (Applicant) participate in at least one of the following programs, and am able to verify my identity and participation as required:

PLEASE CHECK ONE

- | | |
|---|---|
| <input type="checkbox"/> Supplemental Nutrition Assistance Program (SNAP) | <input type="checkbox"/> Temporary Assistance for Needy Families (TANF) |
| <input type="checkbox"/> Section 8 Federal Public Housing Assistance (FPHA) | <input type="checkbox"/> Low Income Home Energy Assistance Plan (LIHEAP) |
| <input type="checkbox"/> Medicaid (not Medicare) | <input type="checkbox"/> National School Lunch Program's free lunch program (NSL) |
| <input type="checkbox"/> Supplemental Security Income (SSI) | <input type="checkbox"/> Income at or below 135% of federal poverty level |

Evidence of program eligibility is required. Where such eligibility cannot be validated through a state and/or federal database or other alternative means, it may be validated in person by a TAG Agent by providing a copy of the Applicant's state issued ID card and a copy of the program identification card or other social service agency documentation showing current participation.

I (Applicant) certify, under penalty of perjury that [check boxes]:

- ☐ I have read and understand this Application, and swear and affirm that the information contained in this Application is true and correct, to the best of my knowledge and belief. I understand that I must meet certain eligibility qualifications as described above to receive Lifeline assistance, and I further understand that providing false or fraudulent information to receive Lifeline benefits is punishable by law.
- ☐ I meet the income-based eligibility criteria for Lifeline service or am a current recipient of the above designated program(s) and will notify TAG within thirty (30) business days (1) if I am no longer participating in any of the above designated program(s); (2) if my household is receiving more than one Lifeline supported service; or (3) if for any other reason my household no longer satisfies the criteria for receiving Lifeline support. I have provided documentation of eligibility if required.
- ☐ The residence address provided below is my primary and permanent residence, and not a second home or business. I understand that if I move from the address included on this Application that I am required to notify TAG of my new address within 30 days.
- ☐ If I provided a temporary residential address to TAG, I will verify my temporary residential address every 90 days.
- ☐ I understand the notification requirements described above with respect to both program eligibility and current address information, and I further understand that I or my household may be subject to penalties if these requirements are not followed.
- ☐ I understand that I may be required to re-certify the continued eligibility of my household for participation in the Lifeline program at any time, but will be required to provide such recertification on at least an annual basis. I understand that failure to re-certify as required will result in the termination of Lifeline benefits. I further understand that I may be subject to the same penalties for providing false or fraudulent information at the time of recertification as are applicable to the initial application.
- ☐ I authorize TAG to access any records required to verify my statements on this form and to confirm my eligibility for the TAG Lifeline credit. I give permission to the duly authorized official(s) administering the above programs to provide to TAG my participation status in any of the above program(s). I give this permission on the condition that the information in this Application and any information about my participation in the above programs provided by officials be maintained by TAG as confidential customer account information.

- ☐ I authorize TAG to release any records required for the administration of the TAG Lifeline credit program (including my name, telephone number and address), including to the Universal Service Administrative Company, to be used in a Lifeline database and to ensure the proper administration of the Lifeline Program. Failure to consent will result in denial of service.
- ☐ My household will receive only one Lifeline benefit and, to the best of my knowledge, my household is not currently receiving a Lifeline-supported service from any other provider.
- ☐ I am entitled to complete this Application, and am not listed as a dependent on another person's tax return (unless over the age of 60).

Applicant's Signature: _____ Date: _____

Name: _____ D.O.B.: _____ Last 4 Digits of SSN: _____

Residence Address (May not be a PO Box): _____

- ☐ The address provided above is a temporary address. I will validate this address with TAG every 90 days until I obtain a permanent address.
- ☐ The address provided above is a Multi-Household residence. (Requires completion of the multi-family worksheet.)

City: _____ State: _____ Zip Code: _____

Mailing Address (if different than residence address): _____

City: _____ State: _____ Zip Code: _____

Contact Number: _____ E-mail address: _____

If Qualifying for Lifeline by Income, the Number of Individuals in My Household: _____

I, _____, hereby attest that the Applicant's ID and supporting documentation checked below were presented and verified.
(Agent/Company Representative Name)

Agent/Company Representative Signature: _____ Date: _____

In order for your TAG Lifeline account to remain active, we require that you use your TAG Lifeline supported wireless service at least once per month.

You can use the service by completing an outbound call, purchasing minutes from TAG to add to your plan, answering an incoming call from someone other than TAG or responding to a direct contact from TAG confirming that you want to continue receiving the service.

For Agent Use Only (check the appropriate boxes for the proof of eligibility viewed and provide information requested; do not copy or retain documentation):

Documents Acceptable Proof for Income-Eligibility (check 1):

- ☐ The prior year's state, federal, or Tribal tax return,
- ☐ Current income statement from an employer or paycheck stub,
- ☐ A Social Security statement of benefits,
- ☐ A Veterans Administration statement of benefits,
- ☐ A retirement/pension statement of benefits,
- ☐ An Unemployment/Workmen's Compensation statement of benefits,
- ☐ Federal or Tribal notice letter of participation in General Assistance, or
- ☐ A divorce decree, child support award, or other official document containing income information for at least three months time.

Documents Acceptable Proof for Program-Eligibility (choose 1 from each list A and B below):

List A - Choose 1

- ☐ Supplemental Nutrition Assistance Program (SNAP)
- ☐ Medicaid
- ☐ Section 8 Federal Public Housing Assistance (FPHA)
- ☐ Supplemental Security Income (SSI)
- ☐ Temporary Assistance for Needy Families (TANF)
- ☐ Low Income Home Energy Assistance Program (LIHEAP)
- ☐ National School Lunch Program's free lunch program
- ☐ State Program 1
- ☐ State Program 2

List B - Choose 1:

- ☐ Program participation card/document
- ☐ Prior year's statement of benefits
- ☐ Notice letter of participation
- ☐ Other official document evidencing participation _____

Last 4 digits of Document from List B _____

Date of Proof Document: ____/____/____

Expiration Date of Proof Document: ____/____/____

Applicant Account Number	Rep/Agent Signature

(STATE) Wireless Lifeline Service Application



When completed mail or fax form to:
1330 Capital Parkway
Carmolton, TX 75006
Fax 866-254-6320
Customer Service: 1-866-959-4918



A complete and signed Lifeline Application and Certification Form ("Application") is required to enroll your household in TAG Mobile, LLC's ("TAG's") Lifeline program in your state. This Application is only for the purpose of verifying your eligibility for the Lifeline service program and will not be used for any other purpose. Lifeline is a government assistance program and only eligible consumers may enroll in the program. Lifeline service is a non-transferrable service and therefore may not be transferred to any other individual, including another eligible low-income consumer. All Lifeline subscribers must complete their own Application for service. Service requests will not be processed until this Application has been received and validated by TAG. Applicants must personally activate TAG's Lifeline service by calling 1-866-959-4918 and selecting Option 2 for activations.

Lifeline benefits are federal benefits and Applicants that make false statements in order to obtain the Lifeline benefit can be punished by fine or imprisonment, de-enrollment or can be barred from the program. Only one Lifeline service is available per household. A household is defined, for purposes of the Lifeline program, as any individual or group of individuals who live together at the same address and share income and expenses. A household may not receive multiple Lifeline benefits from multiple providers. A violation of the one-per-household requirement constitutes a violation of the Federal Communication Commission's rules and will result in de-enrollment from the program, and could result in criminal prosecution by the United States government. The Lifeline benefit may be applied to either one landline or one wireless number, but cannot be applied to both. Note that not all Lifeline services are currently marketed under the name Lifeline.

Each household will be required to verify continued eligibility for Lifeline program participation on at least an annual basis.

Please indicate which Lifeline Program for which you qualify:

☐ Enhanced Lifeline

I (Applicant) hereby certify that I am an eligible resident of Tribal Lands, I participate in at least one of the following programs and am able to verify my identity and participation as required.

PLEASE CHECK ONE

- | | |
|---|---|
| <input type="checkbox"/> Supplemental Nutrition Assistance Program (SNAP) | <input type="checkbox"/> Temporary Assistance for Needy Families (TANF) |
| <input type="checkbox"/> Food Distribution Program on Indian Reservations (FDPIR) | <input type="checkbox"/> Tribally Administered TANF (TATANF) |
| <input type="checkbox"/> Section 8 Federal Public Housing Assistance (FPHA) | <input type="checkbox"/> Low Income Home Energy Assistance Plan (LIHEAP) |
| <input type="checkbox"/> Medicaid (not Medicare) | <input type="checkbox"/> National School Lunch Program's free lunch program (NSL) |
| <input type="checkbox"/> Supplemental Security Income (SSI) | <input type="checkbox"/> Head Start (meeting income qualifying standards) |
| <input type="checkbox"/> Bureau of Indian Affairs General Assistance (BIA) | <input type="checkbox"/> Income at or below 135% of federal poverty level |

☐ Regular Lifeline

I (Applicant) participate in at least one of the following programs, and am able to verify my identity and participation as required.

PLEASE CHECK ONE

- | | |
|---|---|
| <input type="checkbox"/> Supplemental Nutrition Assistance Program (SNAP) | <input type="checkbox"/> Temporary Assistance for Needy Families (TANF) |
| <input type="checkbox"/> Section 8 Federal Public Housing Assistance (FPHA) | <input type="checkbox"/> Low Income Home Energy Assistance Plan (LIHEAP) |
| <input type="checkbox"/> Medicaid (not Medicare) | <input type="checkbox"/> National School Lunch Program's free lunch program (NSL) |
| <input type="checkbox"/> Supplemental Security Income (SSI) | <input type="checkbox"/> Income at or below 135% of federal poverty level |

Evidence of program eligibility is required. Where such eligibility cannot be validated through a state and/or federal database or other alternative means, it may be validated in person by a TAG Agent by providing a copy of the Applicant's state issued ID card and a copy of the program identification card or other social service agency documentation showing current participation.

I (Applicant) certify, under penalty of perjury that [check boxes]:

- ☐ I have read and understand this Application, and swear and affirm that the information contained in this Application is true and correct, to the best of my knowledge and belief. I understand that I must meet certain eligibility qualifications as described above to receive Lifeline assistance, and I further understand that providing false or fraudulent information to receive Lifeline benefits is punishable by law.
- ☐ I meet the income-based eligibility criteria for Lifeline service or am a current recipient of the above designated program(s) and will notify TAG within thirty (30) business days (1) if I am no longer participating in any of the above designated program(s); (2) if my household is receiving more than one Lifeline supported service; or (3) if for any other reason my household no longer satisfies the criteria for receiving Lifeline support. I have provided documentation of eligibility if required.
- ☐ The residence address provided below is my primary and permanent residence, and not a second home or business. I understand that if I move from the address included on this Application that I am required to notify TAG of my new address within 30 days.
- ☐ If I provided a temporary residential address to TAG, I will verify my temporary residential address every 90 days.

- ☐ I understand the notification requirements described above with respect to both program eligibility and current address information, and I further understand that I or my household may be subject to penalties if these requirements are not followed.
- ☐ I understand that I may be required to re-certify the continued eligibility of my household for participation in the Lifeline program at any time, but will be required to provide such recertification on at least an annual basis. I understand that failure to re-certify as required will result in the termination of Lifeline benefits. I further understand that I may be subject to the same penalties for providing false or fraudulent information at the time of recertification as are applicable to the initial application.
- ☐ I authorize TAG to access any records required to verify my statements on this form and to confirm my eligibility for the TAG Lifeline credit. I give permission to the duly authorized official(s) administering the above programs to provide to TAG my participation status in any of the above program(s). I give this permission on the condition that the information in this Application and any information about my participation in the above programs provided by officials be maintained by TAG as confidential customer account information.
- ☐ I authorize TAG to release any records required for the administration of the TAG Lifeline credit program (including my name, telephone number and address), including to the Universal Service Administrative Company, to be used in a Lifeline database and to ensure the proper administration of the Lifeline Program. Failure to consent will result in denial of service.
- ☐ My household will receive only one Lifeline benefit and, to the best of my knowledge, my household is not currently receiving a Lifeline-supported service from any other provider.
- ☐ I am entitled to complete this Application, and am not listed as a dependent on another person's tax return (unless over the age of 60).

Applicant's Signature: _____ Date: _____

Name: _____ D.O.B.: _____ Last 4 Digits of SSN: _____

Residence Address (May not be a PO Box): _____

- ☐ The address provided above is a temporary address. I will validate this address with TAG every 90 days until I obtain a permanent address.
- ☐ The address provided above is a Multi-Household residence. (Requires completion of the multi-family worksheet.)

City: _____ State: _____ Zip Code: _____

Mailing Address (if different than residence address): _____

City: _____ State: _____ Zip Code: _____

Contact Number: _____ E-mail address: _____

If Qualifying for Lifeline by Income, the Number of Individuals in My Household: _____

I, _____, hereby attest that the Applicant's ID and supporting documentation checked below were presented and verified.

(Agent/Company Representative Name)

Agent/Company Representative Signature: _____ Date: _____

In order for your TAG Lifeline account to remain active, we require that you use your TAG Lifeline supported wireless service at least once per month.

You can use the service by completing an outbound call, purchasing minutes from TAG to add to your plan, answering an incoming call from someone other than TAG or responding to a direct contact from TAG confirming that you want to continue receiving the service.

For Agent Use Only (check the appropriate boxes for the proof of eligibility viewed and provide information requested; do not copy or retain documentation):

Documents Acceptable Proof for Income-Eligibility (check 1):

- ☐ The prior year's state, federal, or Tribal tax return,
- ☐ Current income statement from an employer or paycheck stub,
- ☐ A Social Security statement of benefits,
- ☐ A Veterans Administration statement of benefits,
- ☐ A retirement/pension statement of benefits,
- ☐ An Unemployment/Workmen's Compensation statement of benefits,
- ☐ Federal or Tribal notice letter of participation in General Assistance, or
- ☐ A divorce decree, child support award, or other official document containing income information for at least three months time.

Documents Acceptable Proof for Program-Eligibility (choose 1 from each list A and B below):

List A - Choose 1

- ☐ Supplemental Nutrition Assistance Program (SNAP)
- ☐ Medicaid
- ☐ Section 8 Federal Public Housing Assistance (FPHA)
- ☐ Supplemental Security Income (SSI)
- ☐ Temporary Assistance for Needy Families (TANF)
- ☐ Low Income Home Energy Assistance Program (LHEAP)
- ☐ National School Lunch Program's free lunch program
- ☐ Food Distribution Program on Indian Reservations (FDPIR)
- ☐ Bureau of Indian Affairs General Assistance (BIA)
- ☐ Tribally Administered TANF (TATNF)
- ☐ Head Start (meeting income qualifying standards)
- ☐ State Program 1
- ☐ State Program 2

List B - Choose 1:

- ☐ Program participation card/document
- ☐ Prior year's statement of benefits
- ☐ Notice letter of participation
- ☐ Other official document evidencing participation _____

Last 4 digits of Document from List B _____

Date of Proof Document: ____/____/____

Expiration Date of Proof Document: ____/____/____

Applicant Account Number	Rep/Agent Signature



Lifeline Service Application Income Eligibility Worksheet



Individuals in all states are able to enroll in the Lifeline program by demonstrating that their household's annual income is at or below 135% of the Federal Poverty Guidelines. This table should be used to determine whether a Lifeline applicant is eligible for Lifeline service based on the number of individuals in the applicant's household and the applicant's household annual income:

HOUSEHOLD SIZE	INCOME LEVEL
1	\$15,080
2	\$20,426
3	\$25,772
4	\$31,118
5	\$36,464
6	\$41,810
7	\$47,156
8	\$52,502
For each additional person	Add \$5,346

Applicants must list the number of individuals in the applicant's household on the Lifeline application form. Applicants seeking to qualify for Lifeline service based on their household income must present one of the following documents in order to prove eligibility:

- the prior year's state, federal, or Tribal tax return
- current income statement from an employer or paycheck stub
- a Social Security statement of benefits
- a Veterans Administration statement of benefits
- a retirement/pension statement of benefits
- an Unemployment/Workmen's Compensation statement of benefits
- Federal or Tribal notice letter of participation in General Assistance
- a divorce decree, child support award, or other official document containing income information for at least three months time

This is a Lifeline service provided by TAG Mobile, LLC. Lifeline is a government assistance program. Only one Lifeline service is available per household. Households are not permitted to receive multiple Lifeline benefits whether they are from one or multiple companies, wireless or wireline. Proof of eligibility is required for enrollment and only eligible customers may enroll in Lifeline service. Consumers who willingly make false statements to obtain the benefit can be punished by fine or imprisonment or can be barred from the program. Lifeline is a non-transferable benefit. Lifeline customers may not transfer their benefits to any other person.

**BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2012-336-C**

IN RE:)
)
APPLICATION OF TAG MOBILE, LLC)
FOR DESIGNATION AS AN ELIGIBLE)
TELECOMMUNICATIONS CARRIER IN)
THE STATE OF SOUTH CAROLINA)

**TAG MOBILE, LLC
FRANK DEL COL
DIRECT TESTIMONY**

EXHIBIT 4
Training Manual



mobile

Training Manual for Lifeline Supported Services



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Who is TAG Mobile?

TAG Mobile's Mission:

"TAG Mobile provides wireless communication services to cost-conscious customers with a premium-service feel at a value-based price"

How do we do this?

TAG Mobile offers qualifying low-income customers a FREE wireless phone with FREE or discounted anytime minutes each month, good for both local and long-distance calling. There are no credit checks, no contracts, and no activation fee for TAG Mobile Lifeline customers.

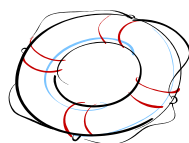
How is this possible?

TAG Mobile offers Lifeline Service Plans supported by the Universal Service Fund. Lifeline is a public assistance program that ensures telephone service is available for qualifying low-income subscribers at just, reasonable, and affordable rates.



What is the Lifeline Program?

LIFELINE PROGRAM



Lifeline is a program supported by the Universal Service Fund that makes basic phone service affordable for qualifying low-income customers. The program is based on the principle of Universal Service, which was established by the Telecommunications Act of 1996. Universal Service means that "consumers in all regions of the nation, including low-income consumers . . . should have access to telecommunications and information services . . ."

Lifeline benefits are limited to a single line of service per residence. Consumers may not receive multiple Lifeline discounts. The Lifeline discount may be applied to either one landline or one wireless number, but **not** both.

Frequently Asked Questions

How do customers qualify for the Lifeline credit?

Customers must be a participant in one of the qualifying state or Federal assistance programs approved by the state in which they reside, or have a combined household income at 135% of the Federal Poverty Guidelines (see pg. 20 of this Manual for additional information on income eligibility requirements).

Who decides which assistance programs qualify for Lifeline?

The FCC in conjunction with the state utility commission decides which assistance programs qualify for Lifeline. The FCC has ruled that all seven (7) federal subsidies and/or an income at or

below 135% of the federal poverty guidelines qualify a consumer for the Lifeline program¹. In addition, states can allow additional qualifying subsidies for eligibility in the Lifeline program, provided those subsidies are income based. If there are no state mandates, then the state defaults to the federal requirements. Each state in which TAG Mobile offers Lifeline Service Plans has its own Lifeline Application and Certification Form, which can be obtained from our website (www.tagmobile.com/site/FORMS.aspx).

Frequently Asked Questions continued

What is the Lifeline Application and Certification Form?

The Lifeline Application and Certification Form (the “Application”) is a document certified by the customer, and validated by a TAG Mobile Agent or employee which requires:

1. Selecting the qualifying program(s) the customer receives;
2. Verifying the customer’s personal information, to include: name, home address, home phone number (if available), date of birth, and last four (4) digits of the customer’s social security number;
3. The customer’s certification signature and the date;
4. The Agent’s verification that they have seen the customer’s government issued identification and proof of eligibility.

TAG Mobile is required to keep the customer’s Application on file in order to continue providing the Lifeline discount, but is prohibited from keeping copies of the customer’s proof of eligibility. Therefore the Agent and/or employee verification is extremely important, as is accurate recordkeeping with regard to noting the type of proof provided by the customer. Additional guidance on Proof of Eligibility documentation is included in Addendum A to this Manual.

What does “certification” mean?

“Certification” means that both the customer and a TAG Mobile Agent or Employee must sign the Lifeline application, certifying certain facts and statements. When the customer signs the Application, they are certifying ***under penalty of perjury*** that the information they provided on the Application is accurate and that they have been informed of, understand and will adhere to the rules and regulations applicable to Lifeline service. The certification signature of the TAG

¹ Pursuant to FCC 12-11, and subject to any waivers that may have been filed by various states.

Mobile Agent or employee certifies that the program eligibility information provided by the customer has been verified by the Agent or employee, either through a database, a third party administrator or other form of documentation as indicated on the application. (See Addendum A for more information regarding Proof of Eligibility documentation.)

What exactly is the customer certifying by signing the Application?

By signing the Application, the customer is agreeing to the certifications described above.

Specifically, the certifications included in the form are:

- ☐ I have read and understand this Application, and swear and affirm that the information contained in this Application is true and correct, to the best of my knowledge and belief. I understand that I must meet certain eligibility qualifications as described above to receive Lifeline assistance, and I further understand that providing false or fraudulent information to receive Lifeline benefits is punishable by law.
- ☐ I meet the income-based eligibility criteria for Lifeline service or am a current recipient of the above designated program(s) and will notify TAG within thirty (30) business days (1) if I am no longer participating in any of the above designated program(s); (2) if my household is receiving more than one Lifeline supported service; or (3) if for any other reason my household no longer satisfies the criteria for receiving Lifeline support. I have provided documentation of eligibility if required.
- ☐ The residence address provided below is my primary residence, and not a second home or business. I understand that if I move from the address included on this Application that I am required to notify TAG of my new address within 30 days. I further understand that if I provided a temporary residential address to TAG, I will verify my temporary residential address every 90 days.
- ☐ I understand the notification requirements described above with respect to both program eligibility and current address information, and I further understand that I or my household may be subject to penalties if these requirements are not followed.
- ☐ I understand that I may be required to re-certify the continued eligibility of my household for participation in the Lifeline program at any time, but will be required to provide such recertification on at least an annual basis. I understand that failure to re-certify as required will result in the termination of Lifeline benefits. I further understand that I may be subject to the same penalties for providing false or fraudulent information at the time of recertification as are applicable to the initial application.
- ☐ I authorize TAG to access any records required to verify my statements on this form and to confirm my eligibility for the TAG Lifeline credit. I give permission to the duly authorized official(s) administering the above programs to provide to TAG my participation status in any of the above program(s).
- ☐ I authorize TAG to release any records required for the administration of the TAG Lifeline credit program (including my name, telephone number and address), including to the Universal Service Administrative Company, to be used in a Lifeline database and to ensure the proper administration of the Lifeline Program. Failure to consent will result in denial of service.
- ☐ My household will receive only one Lifeline benefit and, to the best of my knowledge, my household is not currently receiving a Lifeline-supported service from any other provider.
- ☐ I am entitled to complete this Application, and am not listed as a dependent on another person's tax return (unless over the age of 60).

What is re-certification?

TAG Mobile is required by law to re-certify Lifeline customers annually on the anniversary of the start of their service. During re-certification, TAG Mobile will either verify the customer's continued eligibility through a state database or program administrator, or if such database or program administrator is not available for verifying eligibility, the customer will be required to complete an Annual Certification and Verification Form and self-certify their continued participation in a qualifying program.

If the customer no longer participates in a qualifying program, can they continue receiving Lifeline credit?

No. As stated on the Application, it is the customer's responsibility to inform TAG Mobile if they no longer qualify for the Lifeline program.

How long does it take for the customer to receive their Phone?

Once TAG Mobile receives the completed Application and it passes the Lifeline audit process, the customer should receive their phone within 7-10 business days.

What features are available with TAG Mobile service?

TAG Mobile service includes free voicemail, caller id, and call waiting and allows the customer to make local and long distance calls, send and receive text messages, call directory assistance (additional charges may apply), and check voicemail messages.

What if the customer uses all of their provided minutes?

There are a couple of options: 1) the customer can purchase one of TAG Mobile's replenishment plans; or 2) wait until the next monthly allotment of minutes is loaded (every 30 days on the monthly service renewal date).

Can the customer bring over their current phone number?

Yes! TAG Mobile adheres to the federal requirements related to local number portability, but the customer will need to provide current account information in order to transfer their number to TAG Mobile. Phone numbers associated with closed accounts are not able to be ported.

What type of service area coverage does TAG offer?

Coverage for TAG Mobile is provided by either the Sprint Mobile Network or the Verizon Wireless Network. Between these two companies TAG Mobile is able to offer nearly 100%

coverage across the United States. Coverage maps, separated by state, are available on our website.

- Coverage maps available here: <http://tagmobile.com/site/coverage-maps.aspx>

When do the free monthly minutes reload?

Free minutes will be reloaded once a month on the date that the account was activated. This is not necessarily the first of the month.

Agent Code of Conduct

TAG Mobile hereby sets forth the principles and practices to which Agents/Dealers must adhere in conducting their business related to the distribution of TAG Mobile products and services:

First, Agents/Dealers and their employees shall not engage in any deceptive, false, unethical, unfair or unlawful consumer sales practices, marketing practices or recruiting practices. Agents/Dealers shall ensure that no statements, promises or testimonials are made that are likely to mislead consumers or prospective salespeople.

Second, Agents/Dealers and their employees must comply with all requirements of law, including but not limited to, the Federal Communications Commission's Lifeline rules, 47 C.F.R. § 54.400 *et seq.* While this Code does not necessarily include all legal obligations related to Lifeline supported service, compliance with all pertinent laws and regulations by Agents/Dealers and their employees is a condition of acceptance and continuing partnership with TAG Mobile.

Third, Agents/Dealers and their employees shall conduct themselves in a professional business manner when talking to prospective customers, other Agents/Dealers and their employees.

Fourth, information provided by Agents/Dealers and their employees to prospective customers shall be accurate and complete. Agents/Dealers and their employees shall not make any factual representation to prospective customers that cannot be verified, or make any promise that cannot be fulfilled. Agents/Dealers and their employees shall not present any service or product to any prospective consumer in a false, deceptive or misleading manner.

Fifth, Agents/Dealers and their employees shall educate all potential customers of the benefits and requirements of TAG Mobile's Lifeline supported products and services before having the consumer complete an Application.

Comment [k1]: Reference the training materials where the Lifeline requirements are explained.

Sixth, Agents/Dealers and their employees shall not abuse the trust of prospective customers, or exploit a customer's age, illness, handicap, lack of understanding of the Lifeline program, or unfamiliarity with a language.

Seventh, any marketing materials created by the Agent/Dealer must be approved by TAG Mobile's Marketing and Regulatory departments prior to use and/or distribution, and must clearly state that the service being advertised is a Lifeline supported service; that Lifeline benefits are limited to a single line of service per household; that no multiple Lifeline benefits are permitted; that the discount may apply to one landline OR one wireless number, but not both; and that not all Lifeline services are marketed under the name "Lifeline".

Eighth, Agents/Dealers and their employees will be required to complete the TAG Mobile sales training program that includes training on all Lifeline compliance requirements. Only upon completion of the above can an Agent/Dealer or their employees be certified to sell the Lifeline supported services of TAG Mobile.

Ninth, Agents/Dealers and their employees must follow the steps outlined below, before accepting an Application from a prospective customer:

1. See the prospect's photo ID to confirm they are who they state they are.
2. See proof of the prospect's eligibility for the Lifeline program and confirm that proof documentation identity matches their photo ID.
3. Require the prospect to confirm head of household status
4. Require the prospect to confirm that they are not currently receiving a Lifeline subsidy from another provider and inform the consumer that not all Lifeline services are marketed under the name Lifeline.
5. Explain the certification required in the Application and offer to answer any questions they may have about the program before the prospect's Application is submitted.

Tenth, all Agents/Dealers must submit complete identification (1099 and/or picture ID) to TAG Mobile for all personnel selling or supporting TAG Mobile's Lifeline service offerings, so that personnel can be formally registered and then certified with TAG Mobile.

Eleventh, all Agents/Dealers are required to report [in a timely manner/within 24 hours of discovery] any waste, fraud and abuse identified from any source. Discovery and confirmation of the failure to do so will result in immediate termination.

Twelfth, any returned orders that are identified as being potentially fraudulent or the result of misconduct on the part of the Agent/Dealer and/or their employee will trigger an immediate investigation and TAG Mobile will hold all Agent/Dealer orders until the issue is identified and resolved. If Agent/Dealer employee misconduct is confirmed, the Agent/Dealer will be asked that the employee be immediately terminated from all TAG Mobile related activity. If the Agent/Dealer is found to be a repeat offender, or if the Agent/Dealer does not follow through with the remedial measures required by TAG Mobile, the Agent/Dealer's contract will be immediately terminated.

Thirteenth, Agents/Dealers understand that TAG Mobile makes the ultimate decision regarding consumer Application approvals.

Fourteenth, Agents/Dealers agree to cooperate and work fully with TAG Mobile, state and federal law enforcement authorities, the FCC, USAC and state public utility commissions to detect and resolve duplicate and/or fraudulent Lifeline accounts.

Before Accepting a Lifeline Application

Agents/Dealers and their employees must follow the steps outlined below, before accepting a Lifeline Application from a prospective customer:

1. See the prospect's photo ID to confirm they are who they state they are.
2. See proof of the prospect's eligibility for the Lifeline program and confirm that proof documentation identity matches their photo ID.
3. Require the prospect to confirm head of household status
4. Require the prospect to confirm that they are not currently receiving a Lifeline subsidy from another provider and inform the consumer that not all Lifeline services are marketed under the name Lifeline.
5. Explain the certification required in the Application and offer to answer any questions they may have about the program before the prospect's Application is submitted.

As an Agent the Consumer Should Expect You To:

Tell them who you are and why you're approaching them. Remember you're working **with** TAG Mobile, not **for** TAG Mobile.

1. Promptly end a discussion at their request.
2. Provide a clear understanding of the Lifeline program. In addition to this Manual, USAC's website is a great training resource on the history and background of this program. (www.usac.org)
3. Explain how to return a product or cancel an order.
4. Provide them with marketing materials that clearly outline our Lifeline service and provides them with our direct contact information.
5. Respect their privacy by calling on them at a time that is appropriate.




6. Safeguard any information they provide.
7. Provide accurate and truthful information regarding the price, quality, quantity, performance and availability of our service.

How to Complete a Lifeline Enrollment Application


The **CONSUMER** must fill in the following highlighted fields on page 1

(STATE) Wireless Lifeline Service Application



When completed mail or fax form to:

1330 Capital Parkway
Carrollton, TX 75006
Fax 866-254-6320
Customer Service: 1-866-959-4918



A complete and signed Lifeline Application and Certification Form ("Application") is required to enroll your household in TAG Mobile, LLC's ("TAG's") Lifeline program in your state. This Application is only for the purpose of verifying your eligibility for the Lifeline service program and will not be used for any other purpose. Lifeline is a government assistance program and only eligible consumers may enroll in the program. Lifeline service is a non-transferable service and therefore may not be transferred to any other individual, including another eligible low-income consumer. All Lifeline subscribers must complete their own Application for service. Service requests will not be processed until this Application has been received and validated by TAG. Applicants must personally activate TAG's Lifeline service by calling 1-866-959-4918 and selecting Option 2 for activations.

Lifeline benefits are federal benefits and Applicants that make false statements in order to obtain the Lifeline benefit can be punished by fine or arrest, de-enrollment or can be barred from the program. Only one Lifeline service is available per household. A household is defined, for the purpose of the Lifeline program, as any individual or group of individuals who live together at the same address and share income and expenses. A household may not receive multiple Lifeline benefits from multiple providers. A violation of the one-per-household requirement constitutes a violation of the Federal Communications Commission's rules and will result in de-enrollment from the program, and could result in criminal prosecution by the federal government. The Lifeline benefit may be applied to either one landline or one wireless number, but cannot be applied to both. Note that Lifeline services are currently marketed under the name Lifeline.

Each household will be required to verify continued eligibility for Lifeline program participation on at least an annual basis.

You must be a resident of the state in which you are applying for Lifeline service, and you must:

- (1) participate in at least one of the following programs, and am able to verify my identity and participation as required:

PLEASE CHECK ONE

<input type="checkbox"/> Supplemental Nutrition Assistance Program (SNAP)	<input type="checkbox"/> Temporary Assistance for Needy Families (TANF)
<input type="checkbox"/> Section 8 Federal Public Housing Assistance (FPHA)	<input type="checkbox"/> Low Income Home Energy Assistance Plan (LIHEAP)
<input type="checkbox"/> Medicaid (not Medicare)	<input type="checkbox"/> National School Lunch Program's free lunch program (NSL)
<input type="checkbox"/> Supplemental Security Income (SSI)	<input type="checkbox"/> Income at or below 135% of federal poverty level

Evidence of program eligibility is required. Where such eligibility cannot be validated through a state and/or federal database or other alternative means, it may be validated in person by a TAG Agent by providing a copy of the Applicant's state issued ID card and a copy of the program identification card or other social service agency documentation showing current participation.

I (Applicant) certify, under penalty of perjury that [check boxes]:

- ☐ I have read and understand this Application, and swear and affirm that the information contained in this Application is true and correct, to the best of my knowledge and belief. I understand that I must meet certain eligibility qualifications as described above to receive Lifeline assistance, and I further understand that providing false or fraudulent information to receive Lifeline benefits is punishable by law.
- ☐ I meet the income-based eligibility criteria for Lifeline service or am a current recipient of the above designated program(s) and will notify TAG within thirty (30) business days (1) if I am no longer participating in any of the above designated program(s); (2) if my household is receiving more than one Lifeline supported service; or (3) if for any other reason my household no longer satisfies the criteria for receiving Lifeline support. I have provided documentation of eligibility if required.
- ☐ The residence address provided below is my primary and permanent residence, and not a second home or business. I understand that if I move from the address included on this Application that I am required to notify TAG of my new address within 30 days.
- ☐ If I provided a temporary residential address to TAG, I will verify my temporary residential address every 90 days.
- ☐ I understand the notification requirements described above with respect to both program eligibility and current address information, and I further understand that I or my household may be subject to penalties if these requirements are not followed.
- ☐ I understand that I may be required to re-certify the continued eligibility of my household for participation in the Lifeline program at any time, but will be required to provide such recertification on at least an annual basis. I understand that failure to re-certify as required will result in the termination of Lifeline benefits. I further understand that I may be subject to the same penalties for providing false or fraudulent information at the time of recertification as are applicable to the initial application.
- ☐ I authorize TAG to access any records required to verify my statements on this form and to confirm my eligibility for the TAG Lifeline credit. I give permission to the duly authorized official(s) administering the above programs to provide to TAG my participation status in any of the above program(s). I give this permission on the condition that the information in this Application and any information about my participation in the above programs provided by officials be maintained by TAG as confidential customer account information.

Consumer must identify which of the eligible programs they are currently a participant in by checking the box next to the appropriate program.

Consumer must check each box indicating that they have read and understand each individual statement. ***Note*:** Three (3) additional statements are located on Page 2

How to Complete a Lifeline Enrollment Application continued

The **CONSUMER** must fill in the following highlighted fields on page 2

Please see the note listed on the previous page.

***Note*:** The last four digits of the consumer's SSN will be required to activate the handset they receive.

Top Box: Consumer to check this box if the address listed is a temporary address. If checked the consumer is required to contact TAG every 90 days to update their address in order to continue to receive service.

Bottom Box: Consumer to check this box if they currently do not have their own place and are living with a friend or family member.

***Note*:** The consumer's Residence Address is the used for emergency services (911), Application must include a street address. **This cannot be a P.O. Box!**

A P.O. Box is not a Residence Address; they are considered Mailing Addresses and go in the section below the Residence Address.

City names must be spelled out completely. No abbreviation may be used.

- ☐ I authorize TAG to release any records required for the administration of the TAG Lifeline credit program (including my name, telephone number and address), including to the Universal Service Administrative Company, to be used in a Lifeline database and to ensure the proper administration of the Lifeline Program. Failure to consent will result in denial of service.
- ☐ My household will receive only one Lifeline benefit and, to the best of my knowledge, my household is not currently receiving a Lifeline-supported service from any other provider.
- ☐ I am entitled to complete this Application, and am not listed as a dependent on another person's tax return (unless over the age of 60).

Applicant's Signature: _____ Date: _____

Name: _____ D.O.B.: _____ Last 4 Digits of SSN: _____

Residence Address (May not be a PO Box): _____

- ☐ The address provided above is a temporary address. I will validate this address with TAG every 90 days until I obtain a permanent address.
- ☐ The address provided above is a Multi-Household residence.

City: _____ State: _____ Zip Code: _____

Mailing Address (if different than residence address): _____

City: _____ State: _____ Zip Code: _____

Contact Number: _____ E-mail address: _____

If Qualifying for Lifeline by Income, the Number of Individuals in My Household: _____

_____, hereby attest that the Applicant's ID and supporting documentation checked below were presented and verified.
(Agent/Company Representative Name)

Agent/Company Representative Signature: _____ Date: _____

In order for your TAG Lifeline account to remain active, we require that you use your TAG Lifeline supported wireless service at least once per month.

You can use the service by completing an outbound call, purchasing minutes from TAG to add to your plan, answering an incoming call from someone other than TAG or responding to a direct contact from TAG confirming that you want to continue receiving the service.

For Agent Use Only (check only 1 eligibility category and only 1 box under that category; do not copy or retain documentation):

Documents Acceptable Proof for Income-Eligibility:

- ☐ The prior year's state, federal, or Tribal tax return,
- ☐ Current income statement from an employer or paycheck stub,
- ☐ A Social Security statement of benefit.

Documents Acceptable Proof for Program-Eligibility:

- ☐ The current or prior year's statement of benefits from a qualifying state, federal or Tribal program;
- ☐ A notice letter of participation in a qualifying state, federal or Tribal

on documents (e.g., the consumer's Supplemental program (SNAP) electronic benefit transfer card or card (or copy thereof)); or
document evidencing the consumer's participation in a federal or Tribal program

Corp ID/Dealer Number

Customer MDN

How to Complete a Lifeline Enrollment Application continued

The **AGENT** must fill in the following highlighted fields on page 2.

☐ I authorize TAG to release any records required for the administration of the TAG Lifeline credit program (including my name, telephone number and address), including to the Universal Service Administrative Company, to be used in a Lifeline database and to ensure the proper administration of the Lifeline Program. Failure to consent will result in denial of service.

☐ My household will receive only one Lifeline benefit and, to the best of my knowledge, my household is not currently receiving a Lifeline-supported service from any other provider.

☐ I am entitled to complete this Application, and am not listed as a dependent on another person's tax return (unless over the age of 60).

Applicant's Signature: _____ Date: _____

Name: _____ D.O.B.: _____ Last 4 Digits of SSN: _____

Residence Address (*May not be a PO Box*): _____

☐ The address provided above is a temporary address. I will validate this address with TAG every 90 days until I obtain a permanent address.

☐ The address provided above is a Multi-Household residence.

City: _____ State: _____ Zip Code: _____

Mailing Address (if different than residence address): _____

City: _____ State: _____ Zip Code: _____

Contact Number: _____ E-mail address: _____

If Qualifying for Lifeline by Income, the Number of Individuals in My Household: _____

I, _____, hereby attest that the Applicant's ID and supporting documentation checked below were presented and verified.
(Agent/Company Representative Name)

Agent/Company Representative Signature: _____ Date: _____

In order for your TAG Lifeline account to remain active, we require that you use your TAG Lifeline supported wireless service at least once per month.

You can use the service by completing an outbound call, purchasing minutes from TAG to add to your plan, answering an incoming call from someone other than TAG or responding to a direct contact from TAG confirming that you want to continue receiving the service.

For Agent Use Only (check only 1 eligibility category and only 1 box under that category; do not copy or retain documentation):	
Documents Acceptable Proof for Income-Eligibility:	Documents Acceptable Proof for Program-Eligibility:
<input type="checkbox"/> The prior year's state, federal, or Tribal tax return,	<input type="checkbox"/> The current or prior year's statement of benefits from a qualifying state, federal or Tribal program;
<input type="checkbox"/> Current income statement from an employer or paycheck stub,	<input type="checkbox"/> A notice letter of participation in a qualifying state, federal or Tribal program;
<input type="checkbox"/> A Social Security statement of benefits,	<input type="checkbox"/> Program participation documents (e.g., the consumer's Supplemental Nutrition Assistance Program (SNAP) electronic benefit transfer card or
<input type="checkbox"/> A Veterans Administration statement of benefits,	
<input type="checkbox"/> A retirement/pension statement of benefits,	
<input type="checkbox"/> An Unemployment/Workmen's Compensation statement of benefits,	

The AGENT must see one of the accepted forms of documentation from the eligibility categories listed above that proves that the consumer is a current participant in the eligible program they selected.

After seeing the proof the AGENT must check the appropriate box to identify which type of proof they saw.

After doing so the AGENT must print their name, sign and date the application.

Information on the Income-Based Option²

Federal Poverty Guidelines

135%

Persons in Family or Household	48 Contiguous States
1	\$14,621
2	\$19,670
3	\$24,719
4	\$29,768
5	\$34,817
6	\$39,866
7	\$44,915
8	\$49,964
For Each additional person, add	\$5,049

Proof of Income

Customers must send proof of income in order to receive Lifeline based on income eligibility. All forms must be current. Since each state's mandates are different, the following list is not exhaustive. Please contact your state commission office for a full list of qualifying proof.

- U.S. Tax Return or W-2
- Social Security Benefits
- Veteran's Benefits
- Retirement / Pension Statement
- Unemployment Statement
- Worker's Compensation
- Child Support Decree/Alimony

² Universal Service Administrative Company [internet]. C1997-2009. Available from: http://www.usac.org/res/documents/li/pdf/Income_Requirements.pdf.

Reasons a Lifeline Application Can Be Rejected

- ✓ Duplicate account already exists for that customer within TAG Mobile.
- ✓ Application is not filled out completely by the customer.
- ✓ Order entered into the system doesn't match the information on the Application.
- ✓ Invalid customer information (i.e., customer information that is not able to be authenticated by TAG Mobile's order entry system).
- ✓ Customer's household already receives a Lifeline benefit as identified by the inter-carrier duplicate cross check and/or the USAC accountability database check.
- ✓ The customer provided a P.O. Box as the street/service address.
- ✓ Signature doesn't match name on the Application.
- ✓ Wrong form used (e.g., LA form used for an AR address).
- ✓ Orders that come in with "c/o" or "Attn: _____", indicating that the customer is not using their primary residence address.
- ✓ Agent modified Application form.
- ✓ Agent signing the Application on behalf of the customer.
- ✓ Agent adding information that was not filled out by the customer.
- ✓ No verification of proof of eligibility, or missing/inaccurate documentation of proof of eligibility by the Agent.



Customer Care

Everyone that touches the customer is responsible for some level of customer service, from the dealer who represents TAG Mobile, to the Lifeline audit team who processes the order in a timely manner, to the fulfillment team who ships the phone in working order, to the customer service department who handles any and all issues that arise once the phone is in the customer's hand.

General Customer Care Line – Tier One

1-866-959-4918

TAG Mobile's General Customer Care Line (a/k/a Tier 1) is the first line of contact with the customer after they have established an account. They handle the majority of customer issues.

General Customer Care Line

1. Provide the customer a list of Dealer locations.
2. Reload minutes over the phone.
3. Customer account balance (number of minutes left/reload date).
4. General inquiries.

Tier 2 Customer Care

Tier 2 is the next step in TAG Mobile's customer support process. Calls are transferred to here if the customer is having hardware/technical issues with their handset, or if Tier 1 is unable to resolve the customer's issue.

Tier 2 Customer Service

1. Phone not holding a charge/ will not charge at all
2. Phone not turning on
3. Customer cannot make or receive calls
4. Missing parts or shipped with the incorrect parts
5. Authorize sending out a replacement phone
6. Technical questions about the handset
7. Phone number/area code changes.
8. Resolution of account overages, roaming issues, etc.



Agent Relations

Agent Relations is TAG Mobile's dedicated support team just for Dealers and Agents. They provide the training when you start with TAG Mobile, along with any continued education or re-training that is needed for you or your employees. TAG Mobile's Agent Relations Representatives are available to answer any and all the questions you may have and can handle any issue that may come up for you as an Agent. Whether it's a problem entering an order or a question from a customer that you can't answer, they're there. Have questions about a customer's account, they're there. Need more POP material, they're there....no matter how big or small, every call to Agent Relations is handled quickly and confidently. They're even available on Saturdays!

Contact Information

Phone: 1-866-216-9576

Email: agentrelations@tagmobile.com

Emails should include:

- Name and Dealer/Agent Number
- Description of your question or problem
- If the problem is system related include screen shots when possible

Agent Relations Hours of Operation:

Monday – Friday	7:00 AM to 7:00 PM CST
Saturday	8:00 AM to 3:00 PM CST
Sunday	Closed

Marketing Collateral



Take-Ones



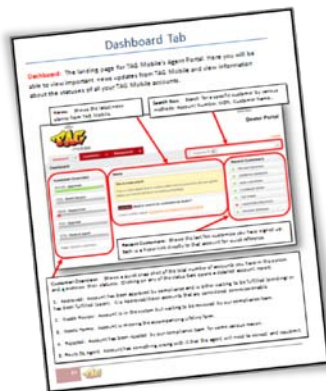
Posters



Banners 2' x 4'



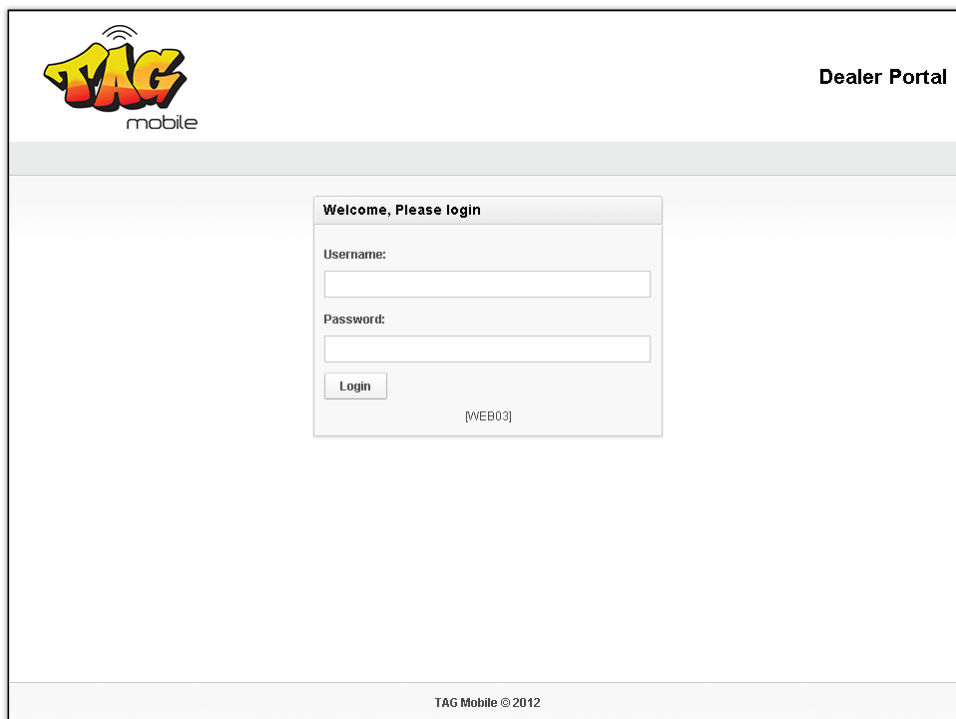
Agent Portal Walkthrough



Login Screen

Login Screen:

Here you need to enter your unique Username and Password. Usernames and Passwords are assigned by TAG Mobile. Contact our Agent Relations Department if you have not yet received your Username and Password. Agent Relations also has the ability to reset passwords, should you forget yours.



The screenshot shows the TAG Mobile Dealer Portal login interface. In the top left corner is the TAG mobile logo, and in the top right corner is the text "Dealer Portal". The main content area features a login form with the heading "Welcome, Please login". The form includes a "Username:" label followed by a text input field, a "Password:" label followed by a text input field, and a "Login" button. Below the button is the text "[WEB03]". At the bottom of the page, there is a footer that reads "TAG Mobile © 2012".

Dashboard Tab

Dashboard:

The landing page for TAG Mobile's Agent Portal is the Dashboard. Here you will be able to view important news updates from TAG Mobile and information about the status of all your TAG Mobile accounts.

The screenshot shows the TAG Mobile Agent Portal Dashboard. At the top, there is a navigation bar with tabs: Dashboard, Customers, Management, and New Order. A search box is located on the right, labeled 'Customer ID' with a dropdown arrow and a search icon. A 'Logout' link is also present. The main content area is divided into three sections: Customer Overview, News, and Recent Customers. The Customer Overview section shows a bar chart with four categories: 1 - Approved (green), 1 - Needs Review (yellow), 2 - Needs Form (red), and 0 - Rejected (grey). Below the chart, it says 'Total: 4 customers'. The News section displays two updates: '6/7/2012 Update to System Outage' and '6/7/2012 System Outage'. The Recent Customers section is currently empty. Red arrows point from text boxes to specific elements: one from 'News' to the News section, one from 'Search Box' to the search box, one from 'Recent Customers' to the Recent Customers section, and one from 'Customer Overview' to the Customer Overview section.

News: Shows the latest news stories from TAG Mobile.

Search Box: Search for a specific customer by various methods: Account Number, MDN, Customer Name...

Customer Overview: Shows a quick snap shot of the total number of accounts you have in the system and an overview of their status. Clicking on any of the status bars opens a detailed account report.

1. Approved: Account has been approved by compliance and is either waiting to be fulfilled (pending) or has been fulfilled (open). It is Approved/Open accounts that are considered commissionable.

2. Needs Review: Account is in the system but waiting to be reviewed by our compliance team.

3. Needs Form: Account is missing the required Lifeline Application.

4. Rejected: Account has been rejected by our compliance team.

Recent Customers: Shows the last few customers you have signed up. Each is a hyper link directly to that account for quick reference.

Cash Drawer

Cash Drawer:

The Cash Drawer is a very important part of the Agent Portal for those Agents/Dealers that take payments. Here you will find information on payments you've taken for the day. At the end of each business day you will need to reconcile the cash drawer. If the Cash Drawer is not closed at the end of the day and a new order is placed in the system, the system will reject the order until the cash drawer is closed and a new tally is started.

Dashboard Customers Management New Order Logout

Cash Drawer Customer ID [Search]

Balance: \$0.00 [Close Out](#)

Open Transactions

Recently Closed

Date	User	Total
------	------	-------

Close Out: To close the Cash Drawer simply click "Close Out". Failure to close out will, again, result in your account being unable to enroll new customers.

Dashboard Tab (continued)

My Documents:

Here you will find training documents, Ad slicks, Logos and Lifeline Applications that can be downloaded or printed.

Dashboard

Customers

Management

New Order

Logout

Documents

Customer ID

Recent

No Category

Description	File
Lifeline Forms	
Arkansas Wireless Form	Arkansas Wireless Lifeline 12_30_11.pdf
Kentucky Wireless Lifeline Form	Kentucky Wireless Lifeline 12_27_11.pdf
Louisiana Wireless Lifeline Form	Louisiana Wireless Lifeline 12_30_11.pdf
Maryland Wireless Lifeline Form	Maryland Wireless Lifeline 11_30_11.pdf
Missouri Wireless Lifeline Form	Missouri Wireless Lifeline 12_30_11.pdf
West Virginia Wireless Lifeline Form	West Virginia Wireless Lifeline 12_30_11.pdf

Customers Tab

Customer Search:

Here you have the ability to search the customer database for a specific customer account. To search the customer database, fill in the fields below using as much or as little information about the customer as you have.

Dashboard

Customers

Management

New Order

Logout

Advanced Customer Search

Customer ID

Search Criteria

ID:

Company:

First Name:

Last Name:

Email Address:

Circuit #:

UID:

Ticket #:

Legacy ID:

Status: ALL

Search

Phone Number:

Street:

City:

State:

Zip:

Statement ID:

Task #:

SSN/EIN:

Disposition Code:

Inventory:

Bill Profile: --None--

☐ Include History


New Order Tab

New Order:

Here is where you will go to create a new Lifeline account.

Step 1 Log into the agent portal

Step 2 Click New Order (note: info in this order demo is for example only)



Welcome: Stephen Howey

Dealer Portal

Dashboard

Customers

Management

New Order

Logout

Customer ID

Customer Overview

25 - Approved

0 - Needs Review

0 - Needs Form

5 - Rejected

0 - Route to Agent

News

Recent Customers

Steve Howey

John Doe

Step 3 Select the drop down box for YES or No;
Then enter the customer's zip code; then select SUBMIT

Step 1

Lifeline Enrollment

Enter the Zip Code of your Residing Address

Have you received lifeline service from any other provider?

No



Zip Code

75006

Tribal Applicants, Please Check This Box

☐

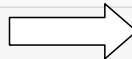
Submit

Step 4 T's & C's Page: Read and then select I UNDERSTAND AND AGREE

Lifeline Enrollment USAC Lifeline Terms and Conditions

A complete and signed Lifeline Application and Certification Form (Application) is required to enroll your household in TAG Mobile, LLCs (TAG) Lifeline program in your state. This Application is only for the purpose of verifying your eligibility for the Lifeline service program and will not be used for any other purpose. Lifeline is a government assistance program and only eligible consumers may enroll in the program. Lifeline service is a non-transferrable service and therefore may not be transferred to any other individual, including another eligible low-income consumer. All Lifeline subscribers must complete their own Application for service. Service requests will not be processed until this Application has been received and validated by TAG. Applicants must personally activate TAG™'s Lifeline service by calling 1-866-959-4918, and selecting option 2.

I Do Not Agree



I Understand and Agree

Step 5 Select the Correct Subsidy (example below for demo only)

Then select ELECTRONICALLY SIGN FOR SUBSIDY PROOF

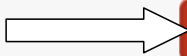
Note: You MUST see the customer's proof of eligibility in order to validate this section. You will be asked to document the type of eligibility documentation you saw later in the electronic enrollment process. Additional guidance on proof of eligibility documentation is included in Addendum A to this Manual.

Please select a Qualify Program: *

- ☐ Select Qualify Program
- ☐ Supplemental Nutritional Assistance Program (SNAP)
- ☐ Temporary Assistance to Needy Families (TANF)
- ☐ Section 8 Federal Public Housing Assistance (FPHA)
- ☐ Supplemental Security Income (SSI)
- ☐ Low Income Home Energy Assistance Plan (LIHEAP)
- ☐ Medicaid (NOT Medicare)
- ☒ Income at or below 135% of federal poverty level

Number of Family Members in Household:

4



Electronically Sign for Subsidy Proof

Proceed to Next Step

Step 6 Select the type of PROOF the customer is showing you (example only)
Then SCROLL down to "SIGN"


Agent Verify
Documents Acceptable Proof for Income–Eligibility: <ul style="list-style-type: none"><input type="radio"/> The prior year's state, federal, or Tribal tax return<input type="radio"/> Current income statement from an employer or paycheck stub<input checked="" type="radio"/> A Social Security statement of benefits<input type="radio"/> A Veterans Administration statement of benefits<input type="radio"/> A retirement/pension statement of benefits<input type="radio"/> An Unemployment/Workmen's Compensation statement of benefits<input type="radio"/> Federal or Tribal notice letter of participation in General Assistance<input type="radio"/> A divorce decree, child support award, or other official document containing income information for at least three months time
Documents Acceptable Proof for Program–Eligibility: <ul style="list-style-type: none"><input type="radio"/> The current or prior year's statement of benefits from a qualifying state, federal or Tribal program<input type="radio"/> A notice letter of participation in a qualifying state, federal or Tribal program<input type="radio"/> Program participation documents (e.g. Supplemental Nutrition Assistance Program (SNAP), Electronic Benefit Transfer Card, Medicaid Participation Card (or copy thereof)<input type="radio"/> Another official document evidencing participation in a qualifying state, federal or Tribal program

Step 8 Type in your 1st and last name; then SIGN and SUBMIT

Agent Name

Electronic Signature

Clear



Close

→

Submit

Step 9 Select PROCEED TO NEXT STEP

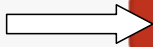
Please select a Qualify Program: *

- ☐ Select Qualify Program
- ☐ Supplemental Nutritional Assistance Program (SNAP)
- ☐ Temporary Assistance to Needy Families (TANF)
- ☐ Section 8 Federal Public Housing Assistance (FPHA)
- ☐ Supplemental Security Income (SSI)
- ☐ Low Income Home Energy Assistance Plan (LIHEAP)
- ☐ Medicaid (NOT Medicare)
- ☒ Income at or below 135% of federal poverty level

Number of Family Members in Household:

4

Electronically Sign for Subsidy Proof



Proceed to Next Step

Step 10 Customer information and Lifeline certifications

- 1) User Acceptance Agreement means you have provided the customer with the necessary information and restrictions

Qualify Program: * ☒ Income at or below 135% of federal poverty level

I certify, under penalty of perjury, that: *

User Acceptance Agreement*

☒ As the Agent, I certify that I provided the customer with an information sheet containing all of the eligibility requirements, and the customer has read and certified these requirements.

☐ I have NOT provided the Enrollee with an information sheet

- 2) OR you have NOT given the info sheet;
 - a. If NOT then have the customer read the statements
 - b. SELECT and SCROLL down and SELECT
I ACCEPT THE USER ACCEPTANCE AGREEMENT

I certify, under penalty of perjury, that: *

User Acceptance Agreement*

☐ As the Agent, I certify that I provided the customer with an information sheet containing all of the eligibility requirements, and the customer has read and certified these requirements.

☒ I have NOT provided the Enrollee with an information sheet

- I authorize TAG to access any records required to verify my statement on this form and to confirm my eligibility for the TAG Lifeline credit. I give my permission to the duly authorized official(s) administering the above programs to provide to TAG my participation status in any of the above program(s). I give this permission on the condition that the information in this Application any any information about my participation in the above program(s) provided by officials be maintained by TAG as confidential customer account information.
- I authorize TAG to release any records required for the administration of the TAG Lifeline credit program (including my name, telephone number and address), including to the Universal Service Administration Company, to be used in a Lifeline database and to ensure proper administration of the Lifeline Program. Failure to consent will result in denial of service.
- My household will receive only one Lifeline benefit and, to the best of my knowledge, MY HOUSEHOLD IS NOT CURRENTLY RECEIVING A LIFELINE SUPPORTED SERVICE FROM ANY OTHER PROVIDER.

[Printer friendly version](#)

☐ I accept the User Acceptance Agreement

Step 11 Complete the customer information. You will need the CORRECT address; last four of the SS# and date of birth. This information will be verified and checked. If there is a mismatch, then the order will not go through.

Driver License/State Identification Card Number (Suggested) Please select ▼

Full Name *

Last 4 Digits of Social Security Number *

Main Telephone Number (Suggested) - -

Date of Birth *

Full Residing Address *

☒ Validate your address here

DROP downs for
DOB

enter correct address, once
VALIDATED, no edits to address

Step 12 Select VALIDATE (this checks the customer information, if not validated you make be given another option). This step is mandatory.



Your address has been successfully validated.

Close

Step 13 After customer information has been validated, continue with the shipping address and plan, then have the customer sign.

SPECIAL NOTES:

If temporary address is selected, then the customer must validate the address with TAG Mobile every 90 days. Be sure they understand this. Failure to validate a temporary address as required may result in de-enrollment from the Lifeline program.

If the customer resides at a multi-household residence, select this box. Multi-Household means there is more than one head of household, independent from each other, living in the same residence at one address. It **does not** mean they live in an apartment complex, duplex or other multi-family dwelling.

- ☐ The address provided above is a temporary address. I will validate this address with TAG every 90 days until I obtain a permanent address.
- ☐ The address provided above is a Multi-Household residence.

Step 14 Plan; the plan or package is based on coverage, State and Zip code.

Some states may have more than one carrier available (Verizon OR Sprint), or more than one plan available, either free or for a fee (depending on state specific requirements)

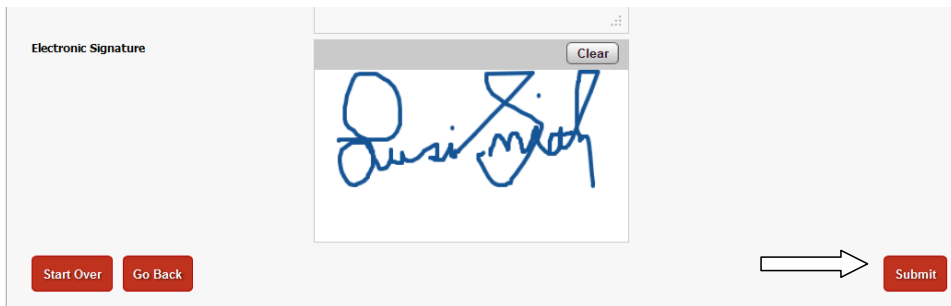
Legal Agreement – please have customer read this, or read it to them, prior to obtaining their signature.

Email Address (Optional)			
have customer enter their email here			
Service Plans:			
Plan Description And Normal Cost	Normal Monthly Cost (\$)	Life Line Discount (\$)	Final Monthly Cost (\$)
<input checked="" type="radio"/> TAG Mobile 68 Whenever Minutes (Verizon) Lifeline Plan	\$13.50	\$13.50	\$0.00

Legal Agreement

Lifeline benefits are federal benefits and Applicants that make false statements in order to obtain the Lifeline benefit can be punished by fine or imprisonment, de-enrollment or can be barred from the program. Only one Lifeline service is available per household. A household is defined, for purposes of the Lifeline program, as any individual or group of individuals who live together at the same address and share income and expenses. A household may not receive multiple Lifeline benefits from multiple providers. A violation of the one-per-household requirement constitutes a violation of the Federal Communication Commissions's rules and will result in de-enrollment from the program, and could result in criminal prosecution by the United States government. The Lifeline benefit may be applied to either one landline or one wireless number, but cannot be applied to both. Note that not all Lifeline services are currently marketed under the name Lifeline.

Step 15 Customers Electronic Signature
Then Select SUBMIT



Electronic Signature

Clear

Start Over Go Back

Submit

Step 16 Note: The system checks for errors such as duplicate orders within the TAG Mobile system, bad customer information and multiple Lifeline accounts for a single customer. If multi-household residence is selected or if a duplicate address is identified within the system, then the customer must complete the multi-household residence form, as seen below.

Lifeline Enrollment

You have been asked to complete this Worksheet because someone else currently receives a Lifeline-supported service at your address. This other person may or may not be a part of your household. Answer the questions below to determine whether there is more than one household residing at your address.

Does your spouse or domestic partner (that is, someone you are married to or in a relationship with) already receive a Lifeline-discounted phone? (check no if you do not have a spouse or partner)

No

Other than a spouse or partner, do other adults (people over the age of 18 or emancipated minors) live with you at your address?

A parent

No

An adult son or daughter

No

Another adult relative (such as a sibling, aunt, cousin, grandparent, grandchild, etc.)

No

An adult roommate

No

Other

No

Do you share living expenses (bills, food, etc.) and share income (either your income, the other person's income or both incomes together) with at least one of the adults listed above in question #2?

No

Select YES if there are other adults living at the same address that are not a part of the customer's household

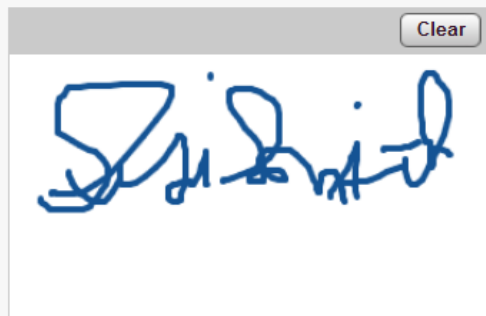
Step 17 Certification of Multi-Household residence. This means there are other independent people or families at the same address.

Step 18 Customer MUST sign again; then SUBMIT

CERTIFICATION

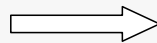
- ☒ I certify that I live at an address occupied by multiple households.
- ☒ I understand that violation of the one-per-household requirement is against the Federal Communication Commission's rules and may result in me losing my Lifeline benefits, and potentially, prosecution by the United States government.

Electronic Signature



Date

05/31/2012



Submit

Step 19 Confirmation with account number.

Account Number:1168095

Thank your for completing the Lifeine Enrollment process and welcome to the TAG Mobile Family. We will be shipping out your TAG cell phone within the next 5 business days.

Print a Copy of Enrollment Form

Assign a Phone

Optional Step for Live Phones

Select Assign a Phone (if you do not have any live phones, do not use this button)

Assign a Phone

ESN

enter ESN here

MDN

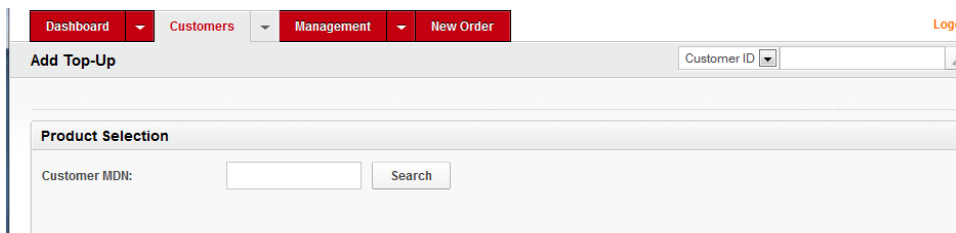
enter MDN here then SUBMIT|

Submit

Customers Tab (cont'd)

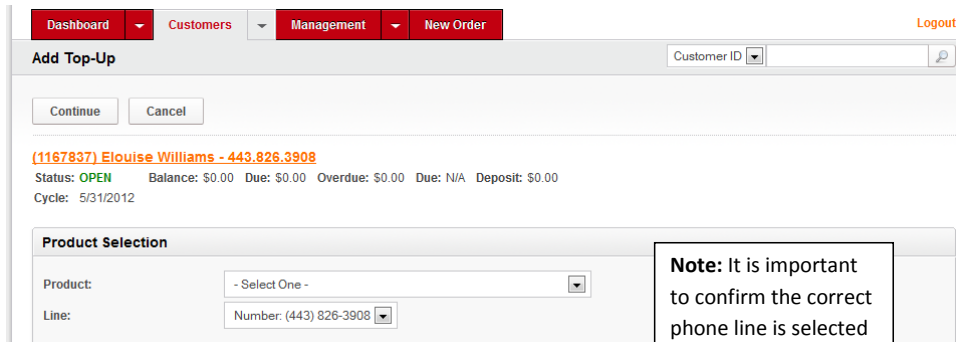
Add Top Up:

Here is where you will go to Add Minutes to an existing customer's account.



The screenshot shows the 'Add Top-Up' form in the Customers Tab. The form has a header with navigation buttons: Dashboard, Customers, Management, and New Order. A 'Logout' link is in the top right. The form title is 'Add Top-Up'. Below the title is a 'Customer ID' dropdown menu. The main section is titled 'Product Selection' and contains a 'Customer MDN' input field and a 'Search' button.

Step One: Enter the customer mobile number to which you want to add minutes and click "Search".



The screenshot shows the 'Add Top-Up' form with customer details and product selection options. The header is the same as the previous screenshot. Below the 'Customer ID' dropdown, there are 'Continue' and 'Cancel' buttons. The customer details section shows: (1167837) Elouise Williams - 443.826.3908, Status: OPEN, Balance: \$0.00, Due: \$0.00, Overdue: \$0.00, Due: N/A, Deposit: \$0.00, Cycle: 5/31/2012. The 'Product Selection' section has a 'Product' dropdown menu (currently showing '- Select One -') and a 'Line' dropdown menu (currently showing 'Number: (443) 826-3908').

Note: It is important to confirm the correct phone line is selected when adding minutes.

Step Two: Select the minute package being purchased by the customer, then click “Continue”.
You will be prompted to confirm what you will be adding to this customer’s line.

Dashboard

Customers

Management

New Order

Add Top-Up

Continue

Cancel

(1167837) Elouise Williams - 443.826.3908

Status: **OPEN** Balance: \$0.00 Due: \$0.00 Overdue: \$0.00 Due: N/A Deposit: \$0.00

Cycle: 5/31/2012

Product Selection

Product: \$39.00 - Unlimited Voice/SMS* \$39.00 + \$2.34 taxes

Line: Number: (443) 826-3908

Step Three: Enter the payment information. Once you have entered the payment type as well as your Agent number click, “Submit”.

Dashboard

Customers

Management

New Order

Payment

Customer ID

Submit

Cancel

(1167837) Elouise Williams - 443.826.3908

Status: **OPEN** Balance: \$0.00 Due: \$0.00 Overdue: \$0.00 Due: N/A Deposit: \$0.00

Cycle: 5/31/2012

Payment Information

Agent: -- 6 - TAG Test Agent

Amount: 41.34

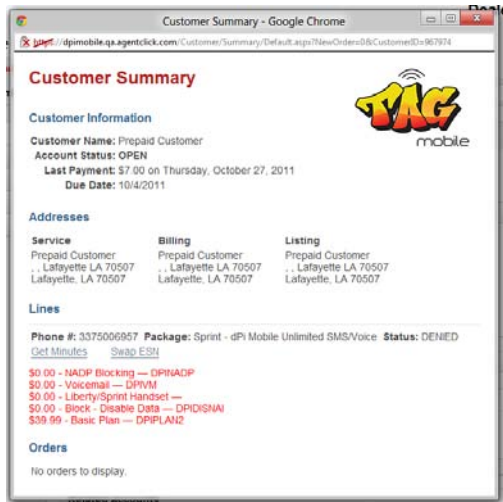
Method: Cash

Reference:

Received On: 6/7/2012

Show Unfiltered

Step Four: A transaction summary will pop up. The transaction is now complete and the minutes will be added to the customer's phone within 5 minutes of the transaction.



Note: The Pop-up Blocker may need to be turned off on your browser in order to view this receipt.

Customers Tab cont.

Create New Pre-Paid Customer here

Dashboard Customers Management New Order

Cancel Process Order

Create Pre-Paid Customer

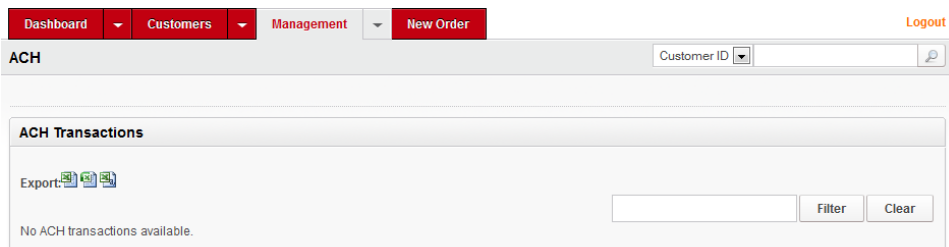
MDN:

ESN:

Get Available Packages

Management Tab

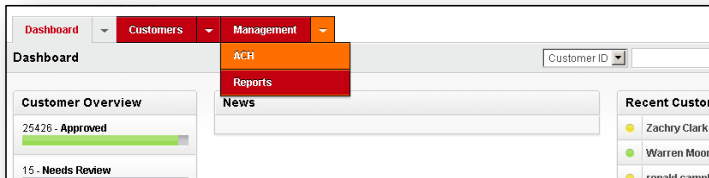
ACH: For those Agents/Dealers taking payments, select the Management tab to view a history of the ACH transactions between you and TAG Mobile. Note: Only “Master” agents will have this view.



The screenshot shows the Management Tab interface. At the top, there are navigation tabs: Dashboard, Customers, Management (selected), and New Order. A Logout link is in the top right. Below the tabs is a search bar labeled 'Customer ID' with a magnifying glass icon. The main content area is titled 'ACH Transactions'. It includes an 'Export' button with three icons (CSV, PDF, Excel) and a 'Filter' button. Below this, it states 'No ACH transactions available.'

ACH Screen: An overview of all transactions will be displayed. Click on any of the transactions to view a detailed listing of all transactions.

Reports: This section is permission based. Access to this area is determined by the type of user you logged in as and is typically limited to Managers and Owners.



Type of Reports: Owner and Managers are able to run five (5) different reports

1. **Cash Drawer Close Report by Date Range:** A listing of consumer payment transactions that have been closed out. (*see cash drawer section*)
2. **Clawback Report:** A listing of accounts where the handset has been returned to TAG Mobile as undeliverable or not ordered.

Management Tab cont.

3. **Customers by Agent ID by Date Range:** a listing of accounts that fall within the date range entered, based on the accounts Created Date. This report will tell you what you have submitted for any given time period.
4. **Customers By Corp ID By Lifeline Status Date (Date Range):**a listing of accounts that fall within the date range entered, based on the accounts Lifeline status date. The Lifeline status date signifies the last date that either the Compliance or Fulfillment touched the account. This report will tell you which accounts have been worked by the Compliance and/or Fulfillment departments for any given time period.
5. **Payments taken by Agent by Date Range:**a listing of the consumer payment transactions processed for any given time period. *(i.e. reload minutes sold)*

Management Tab (cont'd)

Running Reports: Once you select the type of report you want, you will be taken to the screen below. Here you will enter in the desired date range for the report.

Column	Operator	Value	Operand
@Start		01/04/2012	
@End		01/04/2012	

Once you have entered the date range, click Run Report. The report will come back similar to the image below. You'll also have the option to export the report has an Excel file by clicking the Excel icon near the top left corner. The exported file contains additional information not shown on screen, such as the status of the accounts.

To rerun the report using a different date range, click on the "Change Parameters" button. To run a different report click on the "Back To Reports" button.

CorpID	Created_By	Created_Date	Customer_ID	MDN	ESN	First Name	Last Name	Address1	Address2	City
1047	Clark Washington	10/1/2011 8:14:27 AM	905099	2020990299	No Inventory	Emmanuel	Edenil	2110 Alice Ave		Orion Hill
1047	Clark Washington	10/1/2011 8:18:33 AM	905099	2404351103	05400320127	Shanees	Walker	3727 Hampstead Field FL		Waldorf
1047	Clark Washington	10/1/2011 8:21:40 AM	905090	2025787483	No Inventory	Isaac	Perez	2114 Alice Ave		Orion Hill

Account Status Definitions

1. **Needs Review:** An account that has been created but not yet worked by our Compliance Department
2. **Needs Form:** An account with no Lifeline Application attached to the account.
3. **Route To Agent:** An account with incomplete or incorrect information on either the account or the Lifeline Application associated with the account. Agents have 15 days to correct these accounts and resubmit them. If not resubmitted within 15 days, the account will be closed as rejected.
4. **Approved:** An account that has passed our Lifeline Compliance Audit. These accounts fall into two categories:
 - a) **Pending:** Signifies the account has been approved and sent to our Fulfillment Department.
 - b) **Open:** Signifies that the order has been approved and that a handset has been shipped to the customer by our Fulfillment Department. It is at this point that we consider an account “commissionable”.
5. **Rejected:** An account that has failed our Lifeline Compliance Audit.
(see Why a Lifeline Ap



Training Manual Acknowledgment of Receipt

(To be signed and returned to the employee's supervisor)

The TAG Mobile Lifeline Supported Services Training Manual (the "Manual") contains important information about TAG Mobile and our Lifeline Service. I have read and understand the information contained in the Manual, and I further understand that I should consult my supervisor regarding any questions I may have that are not answered in the Manual.

Since the information, policies and procedures described herein are subject to change at any time, I acknowledge that revisions to the Manual may occur. All such changes will generally be communicated through official notices, and I understand that revised information may supersede, modify, or eliminate existing policies and/or procedures.

Furthermore, I understand that this Manual is neither a contract of employment nor a legally-binding agreement. I have had an opportunity to read and understand the Manual, and have executed the Agent Code of Conduct document. I agree to adhere to the rules related to the sale and provision of Lifeline service outlined in the Manual. I also understand that it is my responsibility to comply with the policies contained in this Manual, and any subsequent revisions made to it.

I have received a copy of the Manual on the date listed below. I understand that I am expected to read the entire Manual. Additionally, I will sign and return this Acknowledgment of Receipt on the date specified.

Signature of Employee

Date

Employee's Name - Printed

Company Name - Printed

**BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2012-336-C**

IN RE:)
)
APPLICATION OF TAG MOBILE, LLC)
FOR DESIGNATION AS AN ELIGIBLE)
TELECOMMUNICATIONS CARRIER IN)
THE STATE OF SOUTH CAROLINA)

**TAG MOBILE, LLC
FRANK DEL COL
DIRECT TESTIMONY**

EXHIBIT 5

Lifeline Annual Certification and Verification Forms

Lifeline Annual Certification & Verification Form



When completed mail or fax form to:
1330 Capital Parkway
Carrollton, TX 75006
Fax 866-254-6320
Customer Service: 1-866-959-4918



Each year, TAG Mobile, LLC (f/k/a dPi Mobile, LLC) is required by State and Federal law to participate in the annual verification & certification process for all Lifeline customers. You must re-certify as to your continued eligibility for Lifeline service and your understanding of the rules and regulations related to participation the Lifeline Program. This Certification is only for the purpose of verifying your continued eligibility for the Lifeline service program and will not be used for any other purpose.

Lifeline benefits are federal benefits and making false statements in order to obtain the Lifeline benefit can be punishable by fine or imprisonment, de-enrollment or being barred from the program. Lifeline is a government assistance program and only eligible consumers may enroll in the program. Lifeline service is a non-transferrable service and therefore may not be transferred to any other individual, including another eligible low-income consumer. Only one Lifeline service is available per household. A household is defined, for purposes of the Lifeline program, as any individual or group of individuals who live together at the same address and share income and expenses. A household may not receive multiple Lifeline benefits from multiple providers. A violation of the one-per-household requirement constitutes a violation of the Federal Communication Commission's rules and will result in de-enrollment from the program, and could result in criminal prosecution by the United States government. The Lifeline benefit may be applied to either one landline or one wireless number, but cannot be applied to both. Note that not all Lifeline services are currently marketed under the name Lifeline.

I (Lifeline customer) participate in at least one of the following programs:

PLEASE CHECK ONE

- ☐ Supplemental Nutrition Assistance Program (SNAP)
- ☐ Section 8 Federal Public Housing Assistance (FPHA)
- ☐ Medicaid (not Medicare)
- ☐ Supplemental Security Income (SSI)
- ☐ Temporary Assistance for Needy Families (TANF)
- ☐ Low Income Home Energy Assistance Plan (LIHEAP)
- ☐ National School Lunch Program's free lunch program (NSL)
- ☐ Income at or below 135% of federal poverty level

I (Lifeline customer) certify, under penalty of perjury that [check boxes]:

- ☐ I have read and understand this Certification, and swear and affirm that the information contained in it is true and correct, to the best of my knowledge and belief. I understand that I must meet certain eligibility qualifications as described above to receive Lifeline assistance, and I further understand that providing false or fraudulent information to receive Lifeline benefits is punishable by law.
- ☐ I meet the income-based eligibility criteria for Lifeline service or am a current recipient of the above designated program(s) and will notify TAG within thirty (30) business days (1) if I am no longer participating in any of the above designated program(s); (2) if my household is receiving more than one Lifeline supported service; or (3) if for any other reason my household no longer satisfies the criteria for receiving Lifeline support. I have provided documentation of eligibility if required.
- ☐ The residence address provided below is my primary and permanent residence, and not a second home or business. I understand that if I move from the address included on this Certification that I am required to notify TAG of my new address within 30 days.
- ☐ If I provided a temporary residential address to TAG, I will verify my temporary residential address every 90 days.
- ☐ I understand the notification requirements described above with respect to both program eligibility and current address information, and I further understand that I or my household may be subject to penalties if these requirements are not followed.
- ☐ I understand that I may be required to re-certify the continued eligibility of my household for participation in the Lifeline program at any time, but will be required to provide such recertification on at least an annual basis. I understand that failure to re-certify as required will result in the termination of Lifeline benefits. I further understand that I may be subject to the same penalties for providing false or fraudulent information at the time of recertification as are applicable to the initial application.
- ☐ I authorize TAG to access any records required to verify my statements on this form and to confirm my continued eligibility for the TAG Lifeline credit. I give permission to the duly authorized official(s) administering the above programs to provide to TAG my participation status in any of the above program(s). I give this permission on the condition that the information in this Certification and any information about my participation in the above programs provided by officials be maintained by TAG as confidential customer account information.

- ☐ I authorize TAG to release any records required for the administration of the TAG Lifeline credit program (including my name, telephone number and address), including to the Universal Service Administrative Company, to be used in a Lifeline database and to ensure the proper administration of the Lifeline Program. Failure to consent will result in denial of service.
- ☐ My household will receive only one Lifeline benefit and, to the best of my knowledge, **my household is not currently receiving a Lifeline-supported service from any other provider.**
- ☐ I am entitled to complete this Certification, and am not listed as a dependent on another person's tax return (unless over the age of 60).

Lifeline Customer Signature: _____ Date: _____

Name: _____ D.O.B.: _____ Last 4 Digits of SSN: _____

Residence Address *(May not be a PO Box)*: _____

- ☐ The address provided above is a temporary address. I will validate this address with TAG every 90 days until I obtain a permanent address.
- ☐ The address provided above is a Multi-Household residence. (Requires completion of the multi-family worksheet.)

City: _____ State: _____ Zip Code: _____

Mailing Address (if different than residence address): _____

City: _____ State: _____ Zip Code: _____

Contact Number: _____ E-mail address: _____

If Qualifying for Lifeline by Income, the Number of Individuals in My Household: _____.

In order for your TAG Lifeline account to remain active, we require that you use your TAG Lifeline supported wireless service at least once per month.

You can use the service by completing an outbound call, purchasing minutes from TAG to add to your plan, answering an incoming call from someone other than TAG or responding to a direct contact from TAG confirming that you want to continue receiving the service.

For Office Use Only:

Customer Account Number	Date Received
Customer ESN	Customer MDN
Continued Eligibility Certified	Compliance Department Validation
<input type="checkbox"/> YES <input type="checkbox"/> NO	

**TAG must recertify your line
by year's end. When you
recertify you will be
upgraded to 250 minutes per
month. For more information
call 1-866-302-5348 or go to
www.tagmobile.com/recertify**



mobile

formerly known as dPi Mobile

If you feel you have received this postcard in error please call 1-866-959-4918



[Date]

[Customer Name]

[Address Line 1]

[Address Line 2]

Re: Lifeline Recertification

Dear Valued Customer,

We want to thank you for participating in the Lifeline program through TAG Mobile, LLC ("TAG Mobile"). Under this program you have received a FREE cell phone and preset amount of FREE minutes of service each month.

As a designated provider of Lifeline supported telephone service, TAG Mobile is required to recertify your continued eligibility for the Lifeline program. Therefore, in order to ensure your Lifeline service remains active and in good standing, we ask that you either:

- complete and sign the enclosed Lifeline Annual Certification and Verification Form and return it to us using the self-addressed, stamped envelope provided; or
- go to TAGMobile.com and click on the Annual Recertification tab; or
- call us at (866) 302-5348.

Please note that in order to remain eligible and continue service through the program you must recertify by Month Day, 2012.

Recertifying your eligibility for participation in the Lifeline program ensures that both you and TAG Mobile remain in compliance with all state and federally mandated requirements related to Lifeline program participation. **If you do not respond to this request for recertification by the response deadline, TAG Mobile is required by law to de-enroll you from the Lifeline program, which will result in the discontinuance of your Lifeline service and deactivation of your account.** Please see the enclosed form for important information regarding eligibility and participation in the Lifeline Program.

In the event that you no longer qualify to receive Lifeline supported service but wish to continue to receive wireless service from TAG Mobile, please contact our Customer Service Department at 1 (866) 959-4918 and we will assist you in converting your current Lifeline service to one of our easy and affordable pre-paid service plans.

Thank you again for choosing TAG Mobile!

Recertification Text Message

Free msg TAG: We must recertify your line by year's end. When you recertify you get 250 min per month. For info call 1-866-302-5348 or go to tagmobile.com